

# Standard Operating Procedure UT Arlington Laboratory Evaluation Program

## **Purpose**

The purpose of the Laboratory Evaluation Program is to promote safe laboratory practices and assist campus laboratories in complying with federal, state, local and institutional requirements. The Environmental Health & Safety Office (EH&S) will conduct laboratory evaluations in each laboratory area at UT Arlington in support of this goal.

Throughout this SOP the term laboratory means all facilities covered by the EH&S Laboratory Evaluation Program at UT Arlington, which include the following:

- Research and teaching laboratories such as chemistry, biology, engineering, physics, geology, biomedical engineering, kinesiology etc.
- Animal and plant facilities such as animal surgical suites, greenhouses, etc.
- Environmental laboratories such as ecology outdoor nature laboratory, etc.
- Other facilities posing similar risks that are routinely surveyed by EH&S, such as ceramics and art studios, academic shops, and non-academic shops.

# Background

Research/teaching laboratories and academic/non-academic shops use a variety of hazardous materials (e.g., chemical, biological, radiological) and potentially hazardous equipment (e.g., centrifuges, x-rays, lasers) that carry the potential for causing physical injuries (e.g., via pressurized vessels, vacuum systems) or general fire or life safety hazards (e.g., via flammable materials, electrical/electronic equipment). These substances, equipment, and activities are governed by an array of local, state, and/or federal regulations.

## **Procedures**

## 1. Frequency

EH&S will conduct evaluations in each laboratory at least once per calendar year. Evaluations may be conducted more frequently as deemed necessary by EH&S based on risk factors, laboratory conditions, compliance history, etc. Laboratories that have approved chemical-free areas per <u>SOP – Chemical-free</u> Areas in UT Arlington Laboratories may be evaluated more frequently.

## 2. Scheduling

EH&S will notify department chairs at least two weeks prior to evaluations on a building-by-building basis. The department chairs are responsible for notifying responsible individuals in their department that have a laboratory assignment in each building. Laboratories that have reached 20 plus points per section 5 of this SOP, may be subject to unannounced evaluations.

## 3. Evaluation Preparation

Laboratory evaluations are based on the <u>UT Arlington Laboratory Safety Evaluation Checklist</u> – <u>Chemical</u>, <u>Biological Laboratory Safety Evaluation Checklist</u>, and <u>Shop Safety Evaluation Checklist</u>. These documents may be used to assist the laboratory users in preparing for laboratory evaluations.

#### 4. Evaluation Process

### a. Initial Evaluation

An EH&S staff member will conduct a comprehensive safety evaluation of the laboratory. While performing the evaluation each laboratory user-related item reviewed will be determined to be one of the following:

- Compliant
- Non-compliant
- Non-compliant Critical

More information regarding these determinations can be found in the <u>Laboratory Evaluation</u> <u>Rubric</u>. EH&S will assist the responsible individual (i.e., the PI, shop supervisor, etc.) in determining how to address and correct findings identified during the evaluation and will also provide information regarding potentially hazardous situations and assist in mitigating these hazards.

# b. Reporting

EH&S will issue a report outlining any findings within three (3) business days after the date of evaluation. The report will be provided to the responsible individual. For academic/research laboratories, if "Non-compliant – Critical" deficiencies are noted, the department chair/head will also be provided a copy of the evaluation report.

## c. Response to Findings

The responsible individual must correct any deficiencies and document the correction by responding in writing. This response must include the actions taken to remedy the findings and outline steps taken to prevent their reoccurrence. The response requirements will be dictated by the severity of the findings as described below.

- The evaluation report notes all findings as "Compliant".
  - No response from the responsible individual is required.

Or

- The evaluation report contains at least one finding that is "Non-compliant".
  - The responsible individual must respond in writing within **ten (10) business days** of receiving the laboratory evaluation report. The response must be in writing and sent to EH&S.

Or

- The evaluation report contains at least one finding that is "Non-compliant Critical".
  - The responsible individual must respond in writing within **three (3) business days** of receiving the laboratory evaluation report. The response must be in writing and sent to EH&S with copies to the department chair/head.

If the responsible individual does not provide a response within the prescribed timeframe noted above, points will be assessed per section 5 of this SOP. EH&S will also send a reminder email to the responsible individual and copy their department chair and appropriate dean.

## d. Follow-up Visit

If "Non-compliant – Critical" deficiencies are identified during the laboratory evaluation, EH&S will schedule a follow-up visit with the responsible individual 1-2 weeks after the laboratory evaluation report is issued. An immediate follow-up visit may be requested by EH&S if the situation dictates. The follow-up visit allows EH&S staff to consult with the responsible individual and confirm that corrective actions have been implemented.

# 5. Repeat Deficiencies

EH&S will monitor laboratories and report laboratories that continuously conduct unsafe practices or have continued items of noncompliance. Laboratory user-related findings will be tracked by EH&S for a period of three (3) laboratory evaluations. Each laboratory evaluation finding of "Non-compliant" and "Non-compliant – Critical" will be assigned points per the table below.

| Occurrence           | "Non-compliant"<br>Finding | "Non-compliant – Critical"<br>Finding | Overdue Response<br>to Findings* |
|----------------------|----------------------------|---------------------------------------|----------------------------------|
| First                | 1 point                    | 2 points                              |                                  |
| Second               | 2 points                   | 4 points                              | 4 points                         |
| Third and subsequent | 4 points                   | 8 points                              |                                  |

<sup>\*</sup> The response must be in writing to EH&S, include the actions taken to remedy the findings, and outline steps taken to prevent their reoccurrence.

If the cumulative point total for the three (3) most recent laboratory evaluations reaches 20 to 40 points, EH&S will warn the responsible individual of potential enforcement actions by notifying them in writing via email and copying the department head/chair and appropriate dean/vice president. Additionally, laboratories that have attained 20 or more points may be subject to unannounced evaluations.

If the cumulative point total for the three (3) most recent laboratory evaluations exceeds 40 points, EH&S will refer the issue to the Institutional Lab Safety Board (ILSB) and provide notification to the Vice President for Research and the Vice President for University Administration and Campus Operations.

## EH&S Collaboration with the Institutional Lab Safety Board

The ILSB is composed of faculty members and subject matter experts from across the University. The ILSB's mission is to advise, improve, and support laboratory safety for all UTA faculty and students. The ILSB does this by:

- Raising awareness and interest in safety through training.
- Setting annual safety improvement goals.
- Defining and advising on sanctions for substandard behavior and conditions.
- Being available to assist and guide Principal Investigators and laboratory members in meeting safety requirements.

EH&S will serve as a resource to the ILSB by providing data/information related to the Laboratory Evaluation Program. The ILSB will support the EH&S Laboratory Evaluation Program by addressing serious PI unresponsiveness, advising on difficulties that arise, and/or enforcing sanctions (e.g., unannounced inspections, requiring additional training, suspending or revoking lab privileges) for substandard behavior, as appropriate.