

Environmental Health and Safety

February 26, 2014

PRINCIPAL INVESTIGATORS and SUPERVISORS OF LABORATORIES SUPERVISORS OF CAMPUS SHOP AREAS

Re: New UC Policies:

1. *Minors in Laboratories and Shops*; 2. *Laboratory Safety Training*

UC is making a major commitment to improve our laboratory safety programs. As part of this commitment, a number of new laboratory safety initiatives are being rolled out to each campus, including the new UC policies described below. You have probably already heard about these policies at faculty meetings, via memo, or directly from EH&S. **This memo is intended to inform you that the first two policies noted below are now formally in effect and summarizes their key elements.** The third policy (PPE) has a later effective date and you will be hearing more about it in the future.

1. *Laboratory Safety Training* (effective now)

Full policy: http://www.ehs.ucsb.edu/lc_links/Lab-Safety-Training.pdf

2. *Minors in Laboratories and Shops* (effective now)

Full policy: http://www.ehs.ucsb.edu/lc_links/Minors-in-Labs-Shops.pdf

3. Personal Protective Equipment (effective 3/31/2014)

Full policy: http://www.ehs.ucsb.edu/lc_links/Personal-Protective-Equipment.pdf

Please note these aspects of the first and third policy:

- These UC-wide policies completely *supersede* the existing parallel UCSB policies
 - General Laboratory Safety (2010)
 - Laboratory Personal Protective Equipment (2011)
- The policy requirements are based on existing regulations, i.e., per Cal-OSHA. These are not strictly UC requirements, but apply generally to all California workplaces.

Policy Summary: *Minors in Laboratories and Shops*

This policy sets some boundaries on the activities of individuals under 18 years of age who might wish to enter, or work in campus labs and shops. However, note that per #1 below, most minors do **not** fall under this policy. The policy is meant to protect the safety of children and laboratory personnel, and was established because the minors may be more susceptible to some hazardous agents, but less aware of the potential risks in the laboratory. The supervisor or Principal Investigator has direct responsibilities for implementing most of this

policy's elements for activities occurring in their areas. For further information consult the full policy or these UCOP [FAQs](#). Highlights of the policy include:

1. The policy does **not** apply to those minors who are:
 - a. Enrolled in courses listed in a campus catalog having a laboratory
 - b. Part of an "educational outreach program", including students working on science fair projects and other campus or department sponsored events in which minors are participating as part of a larger group.
2. Minors are never allowed in the following areas, even if they meet the above exemptions
 - a. Laboratories using controlled substances
 - b. Vivaria areas (unless approved by local Institutional Animal Care and Use Committee)
3. Minors are not allowed to work with the following types of highly hazardous materials - see Policy for details and exemptions:
 - a. Highly hazardous chemicals
 - b. Radioactive materials, or radiation-producing machines
 - c. Above Biosafety Level One materials if 14 to 16 y.o.
 - d. Above Biosafety Level Two materials if 16 to 18 y.o.
4. Those under 14 y.o. cannot enter/occupy campus labs and shops. Minors 14 to 18 y.o. are only allowed to enter, if:
 - a. Advanced written authorization obtained from parent/guardian and PI/sponsor (forms provided in Policy);
 - b. All access is under direct supervision of a qualified adult;
 - c. Personal protective equipment is issued and documented training is provided. The UC [Laboratory Hazard Assessment Tool](#) should be used for this purpose.
 - d. Documented training is provided on the hazards of the worksite and precautionary measures, including the lab's Chemical Hygiene Plan, SOPs and emergency procedures;

Another aspect of the policy is its relationship to the new *California Child Abuse and Neglect Reporting Act* (CANRA) and its associated UC policy. In short, this law stipulates that employees (including faculty members and other academic personnel) and administrators whose duties bring them into contact with children on a regular basis, or who supervise others with such duties, are "mandated reporters" for child abuse or neglect occurring on the University's premises, or at official University activities or programs. UCSB is in the process of identifying and contacting those who fall under this program to convey their responsibilities under the Act. Additional information, including contacts for questions can be found at [CANRA](#) and the FAQs above.

Policy Summary: *Laboratory Safety Training*

The two primary aspects of this policy and the tools in place to assist you are:

1. *Requirement:* all laboratory workers must complete a *Fundamentals of Laboratory Safety* orientation before beginning laboratory work. Does not apply to undergraduate students taking laboratory courses offered in the course catalog, except for those working in research laboratories.

Tools: EH&S has offered live and online training for many years that satisfies this. Departments and supervisors are mandated to identify affected individuals and ensure they have completed the training. This is generally arranged when lab keys/key cards are issued by a department.

2. *Requirement:* supervisor shall ensure a documented *Training Needs Assessment* is completed for each laboratory worker that identifies the safety training needed to legally and safely perform their job. The training identified in the Assessment should then be performed and documented.

Tools: EH&S has developed a *Training Needs Assessment* form to aid supervisors in both identifying needed training and in providing a place to easily document it: http://www.ehs.ucsb.edu/lc_links/Training-Needs-Assessment.pdf Provided in the form are links to an online training library and other training resources to assist you in building a local training program that meets your needs. A link/reminder to the assessment form is automatically sent to the supervisor when their workers complete the Fundamentals training in #1.

Addressing Questions and Concerns

These new policies/procedures are clearly a significant change in how UC laboratories operate and will generate questions and concerns. It is also likely that the programs will evolve as we move forward, so your patience is appreciated. We welcome your suggestions and ask that questions be directed as follows:

Animal Resource Center; CA Nanosystems Institute; Geography; Psychology

Contact: Hector Acuna, Laboratory Safety Specialist, Hector.Acuna@ehs.ucsb.edu

Molecular, Cellular and Developmental Biology; Neuroscience Research Institute

Contact: Jamie Bishop, Biological Safety Officer, Jamie.Bishop@ehs.ucsb.edu

Mechanical Engineering; Physics

Contact: Jim Casto, Radiation Safety Officer, Jim.Casto@ehs.ucsb.edu

Chemistry & Biochemistry; Chemical Engineering; Electrical & Computer Engineering; Materials

Contact: Alex Moretto, Chemical Laboratory Safety Officer, Moretto@chem.ucsb.edu

Anthropology; Bren School; Earth Science; Ecology, Evolution & Marine Biology; Marine Science Inst.

Contact: Nelly Traitcheva, Laboratory Safety Specialist, Nelly.Traitcheva@ehs.ucsb.edu



Dave Vandenberg
Laboratory Safety Program Manager

cc: Mike Witherell, Vice Chancellor for Research
Pierre Wiltzius, Dean of Life, Mathematical and Physical Sciences
UCSB Laboratory Safety Committee