



University of New Haven

POLICIES AND PROCEDURES

Policy Title:

UNH Laboratory
Inspection Policy

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Responsible Office: Department of Public Safety

Responsible Official: Associate VP of Public Safety & Administrative Services

Table of Contents

1.	Policy Statement.....	2
1.1.	Purpose and Scope.....	2
1.2.	Review.....	2
2.	Roles and Responsibilities	3
2.1.	Lab Managers.....	3
2.2.	Triumvirate Environmental.....	4
2.3.	Public Safety.....	4
3.	IMEC App.....	4
4.	Laboratory Inspections	5
5.	Weekly Main Accumulation Area (MAA) Inspections.....	5
6.	Weekly Satellite Accumulation Area (SAA) Inspections.....	5
7.	Identifying Corrective Actions.....	5
8.	Disciplinary Action.....	6
8.1.	Lack of Corrective Action.....	6
	Appendix I: Laboratory Inspection Locations	7

1. Policy Statement

The University of New Haven has multiple departments which include teaching and research within laboratories. This is an environment where the activities of students and faculty can involve a variety of hazards. The University of New Haven instills a strong safety culture through best management practices and regulatory inspections of laboratory spaces.

1.1. Purpose and Scope

This policy provides a written description of the laboratory inspection process and expectations that are to take place at the University of New Haven. It has been developed to provide structure to the laboratory inspection process with the objective to anticipate, recognize, and control potentially hazardous conditions within the laboratories.

Inspections are intended to enforce University of New Haven policies, and ensure compliance with (various) regulatory agencies, such as the Connecticut Department of Energy & Environmental Protection (CT DEEP), the US Occupational Safety and Health Administration (OSHA), the US Environmental Protection Agency (EPA), local fire codes, and others.

This policy does not address the procedures associated with inspections of biosafety level-2 labs conducted by CT DEEP during the processes of acquiring and renewing state registrations.

1.2. Review

The Associate Vice President of Public Safety and Administrative Services will review and update this policy whenever necessary or at least annually.

All the elements of this policy are considered University of New Haven policy and may be enforced as such. Failure on the part of the employees to follow the policies of this plan may result in disciplinary action.

2. Roles and Responsibilities

The following individuals have responsibilities regarding this laboratory inspection policy. All laboratory inspections are to be saved to the UNH EHS shared drive. The previous three years of inspections should be available. Please note:

IF (AN INSPECTION EXPOSES A HAZARD THAT) IS PRESSING, TIME SENSITIVE, OR POSES A SERIOUS HAZARD, THE INSPECTION SHOULD IMMEDIATELY BE SUBMITTED TO PUBLIC SAFETY.

2.1. Lab Managers

The following applies to lab managers overseeing all labs within the Chemistry, Forensics, Biology, Dental Hygiene, and Mechanical or Environmental Engineering Departments. The following steps shall be taken to conduct the inspections:

- Assist with quarterly inspections using the online IMEC Safety Inspection software. These detailed lab safety inspections will be conducted in all laboratories within their department.
- If able to do so, infractions are to be corrected at the time of inspection. Corrective action should be taken and documented in the IMEC inspection form prior to submittal.
 - If an infraction cannot be corrected right away, documentation of progress or a plan of action toward resolving the infraction must be noted.
 - Reach out to faculty, other lab personnel, or Public Safety if their assistance is needed to achieve corrective action or if there are questions on how to achieve resolution.
- Provide constructive feedback to Public Safety on any updates and/or changes to this policy as necessary. Communicate infractions with the appropriate lab personnel so that corrective actions may be implemented.
- Follow up with lab personnel and members of Environmental Health & Safety (EHS) to ensure all action items have been completed and closed out within a timely manner.
- Assist EHS in the implementation of any potential preventative measures identified as a result of these inspections.

2.2. Triumvirate Environmental

An Environmental Specialist from Triumvirate Environmental is regularly onsite to strengthen the safety culture and compliance of the University. The Environmental Specialist is responsible for the following:

- Conduct weekly Main Accumulation Area (MAA) inspections using IMEC.
 - Conduct weekly Satellite Accumulation Area (SAA) inspections using IMEC.
 - If able to do so, infractions are to be corrected at the time of inspection. Corrective action should be taken and documented on the IMEC inspection form prior to submittal.
 - If an infraction cannot be corrected during inspection day, documentation of progress or a plan of action toward resolving the infraction must be noted.
 - Reach out to Public Safety or the departmental lab manager if their assistance is needed to achieve corrective action or if there are questions on how to achieve resolution.

2.3. Public Safety

The Environmental Health & Safety program operates under the Department of Public Safety, and is responsible for the following:

- Coordinate with lab managers to conduct quarterly laboratory inspections;
- Work with the environmental specialist with Triumvirate Environmental to implement any corrective actions identified from weekly MAA and SAA inspections;
- Ensure the maintenance of all lab inspection records;
- Assist with account creation for new IMEC users;
- Follow up with lab managers to ensure the appropriate personnel have been contacted to resolve any action items identified as a result of laboratory inspections; and
- Assist with the implementation of any corrective or preventative measures identified during quarterly laboratory inspections.

3. IMEC App

The University of New Haven utilizes an app created by IMEC Technologies as a means of conducting inspections for a variety of compliance programs. Inspections may be located either by using the search query function or scanning a QR code located on the entryway doors for each laboratory.

IMEC automatically distributes completed inspections to the appropriate personnel (e.g. lab managers, members of EHS) via email. All inspection records are automatically maintained by IMEC, the University should also ensure the maintenance of all records for at least 3 years.

4. Laboratory Inspections

Laboratory inspections must be conducted on a quarterly basis. Inspections apply to all departments, do not have time constraints, and will address compliance in the following areas:

- Lab security (e.g. Is the laboratory secured from unauthorized entry? Do all lab users have up-to-date safety training?);
- Hazard communication signage (e.g. Are door signs up-to-date?);
- Chemical and biological safety (e.g. Are all chemicals stored and labeled properly?);
- Electrical and fire safety (e.g. Are all electrical wiring intact and being safely used?); and
- Emergency equipment and egress (e.g. Are spill kits, extinguishers, and other emergency response equipment present and maintained?).

5. Weekly Main Accumulation Area (MAA) Inspections

Inspections of MAAs (a storage area for hazardous waste where waste may accumulate for up to 180 days before requiring removal) must be conducted on a weekly basis. Records must be maintained for at least 3 years. Inspections will address compliance in the following areas, in accordance with CT DEEP regulations:

- Accumulation time (i.e. Is all waste within the 180-day storage time limit?);
- Container condition (e.g. Are all containers closed, in good condition, compatible with its contents, and in secondary containment segregated from incompatible material?);
- Labeling;
- Signage; and
- Emergency response equipment and egress routes.

6. Weekly Satellite Accumulation Area (SAA) Inspections

Inspections are conducted on a weekly basis of satellite accumulation areas. Where SAAs are noncompliant, a physical tag may be left by the inspector (environmental specialist) detailing the required corrective actions, in addition to IMEC records.

7. Identifying Corrective Actions

- Corrective actions should be taken at the time of the inspection. For example, if it is noticed that laboratory personnel are not using the correct personal protective equipment (PPE), they may be spoken to and asked to change their PPE immediately. If items are blocking egress routes or access to emergency equipment, they may be relocated elsewhere.

- All corrective actions taken at the time of the inspection should be noted in the inspection report so that laboratory managers can be reminded to enforce these rules.
- Any compliance infractions noticed that are not able to be immediately corrected should be marked on the inspection report, and the corrective action should be detailed in the “comments” section of that item. A picture should also be included of the infraction.
- Laboratory managers and EHS may choose to delegate corrective actions to other laboratory staff. Procedures for this may differ between departments. It is recommended that each department documents this process in a Standard Operating Procedure.

8. Disciplinary Action

The University of New Haven is dedicated to the safety of its students, faculty, contractors, and visitors. Laboratory safety inspections are to be taken seriously, and everyone must accept personal responsibility for practicing safety on campus.

8.1. Lack of Corrective Action

Public Safety will follow up on any compliance matters to ensure resolution. Issues regarding safety and compliance in which a corrective action is not addressed or achieved will be addressed through the provisions of the University of New Haven’s Laboratory Safety Policy, Section 4.0. General Oversight and Corrective Actions. If infractions are still unresolved with no motivation or plan for correction, the escalation process will be utilized.

Appendix I: Laboratory Inspection Locations

Building	Room	Department
Buckman	B117	Mechanical Engineering
Buckman	B127 - Machine Shop	Mechanical Engineering
Buckman	B301	Chemistry
Buckman	B304	Chemistry
Buckman	B305	Chemistry
Buckman	B306	Chemistry
Buckman	B307	Chemistry
Buckman	B310 (MAA)	Chemistry
Buckman	B310A	Chemistry
Buckman	B310B	Chemistry
Buckman	B310C	Chemistry
Buckman	B311	Chemistry
Buckman	B313	Chemistry
Buckman	B314	Chemistry
Buckman	B331A	HIGA Polymer Lab
Buckman	B331B	Environmental Engineering
Buckman	B332	Chemistry & Biomedical Engineering

Bergami Hall	101E	Makerspace – Mechanical Engineering
Charger Plaza	CP05	Biology
Charger Plaza	CP06	Biology
Charger Plaza	CP07	Biology
Charger Plaza	CP12	Biology
Charger Plaza	CP14	Biology
Charger Plaza	CP18	Biology
Charger Plaza	CP22	Biology
Charger Plaza	CP24/24A	Biology
Charger Plaza	CP108/110	Forensics
Charger Plaza	CP118	Biology
Dental Hygiene Building	Laboratories & Prep Rooms	Dental Hygiene
Dodds	D103	Environmental Science
Dodds	D204	Forensics
Dodds	D301	Biology
Dodds	D302/303	Biology
Dodds	D304	Biology
Dodds	D305	Biology
Dodds	D306	Biology
Dodds	D307	Biology
Dodds	D308	Biology

Dodds	D309	Biology
Dodds	D311/312	Biology
Dodds	D313	Biology
Dodds	D408	Forensics
Dodds	D411	Forensics
Dodds	D412	Forensics
Dodds	D413B	Forensics
Dodds	D414	Forensics
Dodds	D415	Forensics
Dodds	D415A	Forensics
One Care Lane	131/131A	Medical Laboratory Science
New Haven Canal Dock Boathouse	Teaching Laboratory	Biology & Environmental Science

**All of the above locations have either a Satellite Accumulation Area (SAA) or Main Accumulation Area (MAA) for hazardous waste that Triumvirate Environmental inspects weekly. Full lab inspections are conducted for the above locations at least quarterly.