



Case Department of Occupational and Environmental Safety

“SAFETY COMES FIRST”

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Inactive vs. Storage Mode: Knowing the Difference

Recently, there has been some confusion regarding *inactive* and *storage* modes. In order to clear up any misconceptions, please note the following distinctions:

INACTIVE MODE

The Radiation Safety Office (RSOF) uses the classification of “Inactive Mode” for laboratories that do not need to possess or use radioactive material in the foreseeable future. If you wish to place your laboratory in Inactive Mode the following items must be completed:

1. Send a letter of intent to the RSOF. This can be done via fax or email.
2. Follow the guidelines in the Laboratory Decommissioning/Lab Relocation section on page 26 of the Radiation Safety Lab User Manual. This manual can be accessed on the DOES website.
3. Return all personnel dosimetry to the RSOF.

If you would like your laboratory to regain ACTIVE MODE status the following items must be completed:

1. Send a letter to the RSOF requesting reactivation. This can be done via fax or email.
2. Send updated room maps with survey locations, as well as an updated protocol to the RSOF.
3. Verify that survey meters are within annual calibration.
4. Verify that radiation workers, ancillary radiation workers, and the AU were re-trained within the past year
5. Obtain required personnel dosimetry for radiation workers, ancillary radiation workers, and AU.
6. Replace all required postings and labels.

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Quiz: Know Your Role in the Lab

Here are a few questions EVERY lab worker should be able to answer:

Know Your Role Quiz

1. Who is your P.I.?
2. Where is your CHP?
3. To what chemicals/radiation are you exposed to?
4. Where can MSDS be obtained for these chemicals?
5. What are the hazards associated with these chemicals/this radiation?
6. How do you protect yourself from these hazards?

Take 5-10 minutes this week to do this exercise in your lab so that EVERYONE knows the answer to these very important questions.

Inactive vs. Storage Mode: Knowing the Difference (con.)

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STORAGE MODE

“Storage Mode” is defined as an AU who wishes to remain active but who will not be using their isotopes for a period greater than 6 calendar months. The survey frequency is reduced to once each six calendar months, starting with the date of the declared non-use.

If you wish to go into storage mode, send an e-mail to Karen Janiga indicating that you want to go into storage mode (meaning isotopes will be retained in storage but not used until the lab is reinstated to active-use mode). For periods of isotope use exceeding six calendar months, required AU survey frequency shall be reduced to once each six calendar months, starting on the date of declared non-use.

Resumption of isotope use shall not occur *until* and *unless* an e-mail is sent to the RSO. The lab will then be required to perform contamination surveys as stated in their protocol.

PLEASE NOTE!

If you do not have isotopes in the laboratory, but still want to retain active use status, you must either survey laboratories commissioned for radioactive material use monthly or decommission the laboratory. The lab cannot go into storage mode to reduce the survey frequency, since the AU must have isotope inventory that is not being used for greater than 6 months to qualify for this survey reduction.

“Storage Mode is defined as an AU who wishes to remain active but who will not be using their isotopes for a period greater than 6 calendar months.”

Hand Lotions in the Lab

If you work in a lab, no doubt you are already aware that federal and state laws *prohibit* storing as well as eating food, drinking liquids, chewing gum, smoking, applying cosmetics, and taking medications in *any* CASE laboratory areas. This includes standard laboratory areas, cold rooms, warm rooms, equipment rooms, common use and other laboratory related areas. Any food, drink, and their containers found in laboratory areas will be confiscated and disposed of as bio-hazardous waste. All food or drink used for research purposes must be labeled, "NOT FOR HUMAN CONSUMPTION."

Certain hand lotions are, however, permitted. According to 29 CFR 1910.1030, hand lotion is not considered a cosmetic and is permitted. However, after this rule went into effect, OSHA became aware that petroleum-based hand lotions affect the integrity of latex gloves. If you are using latex gloves, you should use only non-petroleum based hand lotions. **There are five recommended hand lotions that are non-petroleum based. These lotions are recommended if you are using latex gloves in the laboratory.**

The five recommended non-petroleum based hand lotions include the following:

- **Cetaphil**
- **Jason Natural Cosmetics**
- **Nexcare**
- **Keri Lotion**
- **Johnson and Johnson Baby Lotion**

If you have any question regarding this matter, please contact DOES at the phone number or email provided on the front of this newsletter.

"If you are using latex gloves, you should use only non-petroleum based hand lotions."

*Mark Your Calendars:
January 19 is MLK Day*

Avoid a Fall No Employee Wants to Take

“Although there are many factors that contribute to workplace falls, such as wet floors, poor lighting, cluttered aisles, ladder/scaffold collapses, and improper use of equipment, most fatal injuries are the result of falls to a lower level.”

Workplace falls are a serious safety concern for employers, whether injuries occur on the same level or from elevated work surfaces. This is due to the fact that injuries resulting from workplace falls often affect multiple body parts — such as backs, knees, ankles, wrists, and heads — and require longer recovery times, or worse yet, cause fatalities. Although there are many factors that contribute to workplace falls, such as wet floors, poor lighting, cluttered aisles, ladder/scaffold collapses, and improper use of equipment, most fatal injuries are the result of falls to a lower level.

What can you do to protect employees from falls at elevated heights?

Provide proper equipment

Select equipment that meets your needs. Conducting an assessment of your facility and deciding what type of equipment is necessary to accomplish required tasks is an important first step.

Think about height

Consider the height employees are expected to reach to perform maintenance tasks or repairs. OSHA is very specific when it comes to ladder lengths.

Think about weight

Consider the working load, which includes the weight of the user, as well as the materials and tools the ladder will need to support. Check the labels on commercial ladders for duty ratings to find out the maximum weight capacities.

Think about job activity

Provide portable ladders to enable employees to reach working platforms.

Think about maintenance

Keep equipment in good condition using proper care and maintenance techniques. Also inspect ladders for damage to rails, rungs, connections, and overall structural defects when they are first purchased and periodically before being used by employees.

Require fall protection

Requiring employees to use the right tools for the job is a critical element of safety. One of these tools is the use of fall protection systems when working on elevated surfaces. Another is the use of guardrails or other systems, if guardrails are not feasible or impractical — such as handrail and stair rail systems, designated areas, hole covers, safety net systems, ladder cages, ramps and bridging devices, and personal fall arrest systems.

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Research Laboratory Termination

In order to ensure safety and uniformity in the termination of a research laboratory at CWRU, DOES has a Research Laboratory Termination procedure in place that applies to any research laboratory that is terminating the laboratory. While all the specifics of this procedure may be found in the “FORMS/MANUALS” link under “Laboratory Termination Procedure,” it is important that we are reminded of this essential procedure. Below is the proper procedure is outlined for terminating your research laboratory.

PROCEDURE

All items must be initiated at least 3 weeks prior to departure.

1. Send letter to DOES

*Include the following:

- departure date
- new location
- inventory of chemicals and biologicals being transferred to new location
- inventory of chemicals and biologicals being transferred to another CASE PI
- inventory of chemicals, biologicals, and isotopes being disposed of
- a list of lab personnel leaving CASE (for those employees remaining at CASE, indicate where they will be working on campus)
- certification that any biological safety cabinets do not present a biological hazard (include the entire history of the cabinet and all types of work performed in the hood). If this is not possible, see step 8.

*A letter of approval from the new university regarding acceptance of inventories and equipment.

2. Chemical Inventory

**Transfer of chemical inventory to new location:* Must only be moved by professional chemical movers. Contact Safety Services for advice.

**Transfer of chemical inventory to a CASE PI:* Receiving PI must submit new chemical inventory to Safety Services.

**Disposal of chemical inventory and waste:* Must be listed on the Disposal Listing for Hazardous Waste and Unwanted Chemicals form, available from Safety Services. An account number must be included on the form.

Note: The Disposal Listing for Hazardous Waste and Unwanted Chemicals (pink sheets) must be submitted to Safety Services no later than Wednesday, by noon, the week before the scheduled move. All waste must be tagged with the Hazardous Waste Tags so that pick-up can occur that same week.

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“In order to ensure safety and uniformity in the termination of a research laboratory at CWRU, DOES has a Research Laboratory Termination procedure in place that applies to any research laboratory that is terminating the laboratory.”

Research Laboratory Termination (continued from page 5)

3. Pathological and Microbial Inventory

**Transfer of pathological and microbial inventory to new location:* Must be shipped according to the Department of Transportation regulations. Contact Safety Services.

**Transfer of pathological and microbial inventory to a CASE PI:* Receiving PI must submit new biological inventory to Safety Services.

**Disposal of pathological and microbial inventory:* Must be autoclaved before disposal.

NOTE: Discarded pathological and microbial inventory must be disposed by the week before the scheduled move.

NOTE: Any laboratory using Select Agents must contact DOES before initiating any transfer or disposal.

4. Radiological Inventory

**Transfer of radiological inventory to new location:* External Transfer Form must be completed. Contact Radiation Safety for advice.

**Transfer of radiological inventory to a CASE PI:* Internal Transfer Form must be completed. Contact Radiation Safety for advice.

**Disposal of radiological inventory:* Isotopes must be listed on Waste Disposal Form. The Waste Disposal Form is available from Radiation Safety.

NOTE: Discarded radiological inventory must be disposed by the week before the scheduled move.

5. Return all dosimetry badges

6. Equipment clearance

*Submit a list of all equipment (AT LEAST THREE WEEKS PRIOR TO THE SCHEDULED MOVE) that will be moved by professional movers or disposed of. The equipment must be cleaned and emptied for clearance approval TWO DAYS prior to the scheduled move (this means that use of the equipment must cease two days prior to the move date). This is an example of how the list should be submitted:

Assigned Number	Equipment Description	Case ID	Disposition	Location
1	Kenmore Refrigerator	98-1345	Disposal (acct #:123-4567)	BRB 100
2	Incubator	N/A	Relocate	BRB 100A

NOTE: The assigned number must be placed on the associated piece of equipment. If equipment is to be disposed of, an account number must be provided. Identify equipment with high voltage or high current. Safety Services and Plant Services must inspect this equipment for PCB's. EQUIPMENT MAY NOT BE MOVED BY PROFESSIONAL MOVERS UNTIL SAFETY SERVICES

(continued on next page)

Research Laboratory Termination (continued from page 6)

...ATTACHES A SAFETY CLEARANCE FORM.

*Survey radiological equipment (to be moved by professional movers) and attach results to the equipment. Contact Radiation Safety to perform a confirmation survey.

*Equipment moved by lab personnel must be free of radiological, bio-hazardous, and chemical contamination, but does not require a clearance.

7. Room clearance

*Submit Safety Clearance and Protocol Request form(s) for each room requiring Safety clearance.

*After room is empty, survey room(s) for radiation. Contact Radiation Safety to perform a confirmation survey.

8. Biological Safety Cabinets (BSC)

*Decontaminate BSC with paraformaldehyde (if written certification cannot guarantee a biologically hazard-free BSC). Contact Laboratory Certification Services to schedule (1-800-800-7105).

Contact safety services (369-2907) or radiation safety (368-2906) if you have any questions concerning the above procedure.

State of Ohio Waste Log Requirement Reminder

The State of Ohio regulations require that generators and their satellites (laboratories) keep leakage logs for the storage containers used for chemical waste. Therefore, Safety Services is requiring all laboratories generating chemical waste to keep a log that consists of weekly inspections of all containers containing waste.

The log must be in a bound book (not a binder) with dates of inspections, name of inspector, and the status of the waste container at that time (acceptable or leaking). It is suggested that each primary investigator choose a member of his staff to conduct the weekly inspection and to keep the log in the laboratory area so that Safety Services can also audit these logs at inspection time.

The importance of this log cannot be overstated. Similar to the label on hazardous waste on each waste container, failure to check the log can result in a substantial fine to each investigator for each period of non compliance.

It is our goal to keep all laboratories in compliance with uninterrupted research because of EPA error. Should you have any questions, please feel free to call 368-2907.

Avoid a Fall No Employee Wants to Take (continued from page 4)

The Bottom Line on Avoiding a Workplace Fall...

Although workplace safety depends on many factors, being proactive and recognizing and eliminating known hazards, as well as training employees, are important steps you can take to avoid the fall that no employee wants to take. If you have any questions about how to avoid workplace falls, please contact DOES.

Where is DOES?

If you're new to Case (or simply haven't been to visit us yet), we are located in the Service Building on the 1st floor just off Circle Drive between the Health Sciences Library to the east and the Powerhouse Building to the west. For clarity, call x2906/2907 or check our website (<http://does.case.edu>.) for an interactive map before your visit. Keep in mind that much of the information and services (e.g., Safety Services manuals and forms, upcoming training sessions, online training sessions, past newsletters, etc.) that DOES provides can be found conveniently online at <http://does.case.edu>. at any time.

*Upcoming Training Sessions**

IMPORTANT NOTE: While all laboratories must attend training at DOES, labs must hold specific training in the CHP and ECP as it pertains to the actual work they do. Labs will also need an outline of the CHP and ECP training and a sign in sheet to accompany. Store the sign-in sheet and outline with the CHP and ECP. IT will be asked for during lab inspections.

New Hazard Communication (Right-to-Know) Training

Retraining is required annually.
DOES Small Meeting Room - Service Building 1st Floor
PREREGISTRATION IS REQUIRED! - Please call 368-2907

New Radiation Safety Training

Retraining is required annually.
DOES conference room - Service Building 1st Floor
PREREGISTRATION IS *REQUIRED* ! - Please call 368-2906

New Laser Safety Training

Retraining is required annually.
DOES conference room - Service Building 1st Floor
PREREGISTRATION IS *REQUIRED* ! - Please call 368-2906

*Upcoming Training Sessions**

FOR THE FOLLOWING CLASSES:

**Laboratory Safety Retraining
Regulated Chemical Retraining
Hazard Communication (Right-to-Know) Retraining
Bloodborne Pathogen Retraining
Radiation Safety Retraining
Laser Safety Retraining
Respirator Safety Retraining**

Please retrain on the Internet at <<http://does.case.edu>> and click on Training.
Print test and fax or mail it to the DOES office.
If your training is more that one year overdue, then you must attend
the training class in person and can not retrain online.

FOR THE FOLLOWING CLASSES:

**New Laboratory Safety Training
New Regulated Chemical Training (Formaldehyde, Benzene, Methylene
Chloride, Vinyl Chloride, etc.)
New Bloodborne Pathogen Training
New Respirator Safety Training
New BSL-3 Safety Training**

Retraining is required annually.
DOES Conference Room - Service Building 1st Floor
PREREGISTRATION IS REQUIRED! - Please call 368-2907

***As always, consult our website (<http://does.case.edu>) for a full schedule of training sessions**

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Please remember that our updated DOES website provides many resources to meet your safety needs. The DOES website (<http://does.case.edu/>) includes all of the following resources:

- Safety Services Manuals and Forms
- Archived DOES Newsletters
- Training Class Schedules
- Staff Information
- MSDS
- Important Safety Links
- Our Mission Statement
- Contact Information

If you have any questions about our website, please feel free to contact us at ext. 2906/2907

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