

Colleagues,

I feel it likely that the auditors will return to CMSE in just a couple weeks. Our biggest weakness was overall knowledge of, and familiarity with, our roles and responsibilities within the EHS management system, especially in the cases of the PI's they interviewed during the pilot audit. So if you're still unsure of what the system is and your function within it, take a few minutes to peruse the EHS web site at;

<http://web.mit.edu/environment/ehs/>

It's a good starting point for all types of EHS information.

If you're unsure of your training status, please check it at;

<http://web.mit.edu/environment/training/>

as they will be checking this rather closely, especially, as mentioned below, the required training such as Managing Hazardous Waste, which is a yearly necessity.

Please be vigilant in the upkeep of your labs, especially the hazardous waste accumulation areas, and the use of personal protection equipment, especially safety glasses. If you have any questions don't hesitate to contact me, if I can't answer your questions I will find who can.

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CHEMICAL HYGIENE AND SAFETY PLAN

Responsibility, Authority and Resources

Center Director (M. F. Rubner)

- Responsibility and authority to see that Chemical Hygiene Plan is written, updated and implemented.
- Appointed the Chemical Hygiene officer in accordance with 29 CFR 1910.1459 (b).
- Final responsibility for the safety and health of the employees and students conducting work in his department, and visitors.

Chemical Hygiene and Safety Officer (M. F. Rubner)

Assist responsible PI's and Dept Chairs to:

- Develop Chemical Hygiene Plans for the department and implement plans for labs together with administrators.
- Monitor safe procurement, use and disposal of chemicals, with admins and PI's.
- Assist PI's with required safety audits and their documentation (training docs included).
- Advise PI's concerning adequate facilities and procedures under regulation.
- Seek ways to improve the Chem Hyg Program.
- Act as a liaison between the EHS Coordinator and Faculty.
- Co-Chair the CMSE-EHS Committee.

EHS Coordinator (Ed Kruzel)

- Meet regularly with EHS Office Lead Contact.
- Report to CMSE Head.
- Coordinate EHS-MS activities of EHS Representatives within CMSE.
- Coordinate closely with CMSE and CHO and assist in developing EHS related SOP's.
- Ensure CMSE personnel receive appropriate regulatory training.
- Participate in periodic inspections and/or receive reports of CMSE's labs and facilities.
- Assist PI's/EHS Representatives with lab or space registration.
- Serve as chair or co-chair of the CMSE EHS Committee.
- Serve as steward of CMSE's EHS training, auditing & inventory record keeping (including providing EHS Office with SARA Title III reporting information).
- Meet with other EHS Coordinators regularly to share information, discuss EHS-MS, new or changing EHS regulations, and best practices.

EHS Coordinator (Ed Kruzel)

- Review significant EHS issues for proposed experiments with PI and EHS Lead Contact/Team Review especially changes that could impact compliance with EHS requirements.
- Arrange for EHS decommissioning of lab spaces or special inspections as necessary.
- Meet with regulators during inspections if requested by EHS to do so.

Laboratory, SEF and Teaching Lab Supervisors

- Ensure that all work is conducted in accordance with the (departments, Center, etc) Chemical Hygiene Plan.
- Define the location of work areas where toxic substances and potential carcinogens will be used, and ensure that the inventory of these substances is properly maintained.
- Obtain, review, and approve standard operating procedures, detailing all aspects of proposed research activities that involve hazardous agents.
- Prepare a Standard Operating Procedure for use of test substances when this use involves alternate procedures not specified in these guidelines. The S.O.P. shall include a description of the alternate procedure and an assessment of the alternate controls that will be used.
- Define hazardous operations, designating safe practices, and selecting protective equipment.
- Ensure that program and support staff receive instructions and training in safe work practices, use of personal protective equipment, and in procedures for dealing with accidents involving toxic substances.
- Ensure that employees understand the training received.
- Ensure that all personnel obtain the medical examinations and protective equipment necessary for the safe performance of their job.

Laboratory, SEF and Teaching Lab Supervisors

- Monitor the safety performance of the staff to ensure that the required safety practices and techniques are being employed.
- Arrange for workplace air samples, swipes or other tests to determine the amount and nature of airborne and/or surface contamination, inform employees of the results, and use data to aid in the evaluation and maintenance of appropriate laboratory conditions.
- Assist the EHS Office when necessary.
- Conduct formal laboratory inspections quarterly to ensure compliance with existing laboratory S.O.P's.
- Prepare procedures for dealing with accidents that may result in the unexpected exposure of personnel, or the environment, to a toxic substance.
- Investigate accidents and report them to the Chemical Hygiene Officer. Include procedures that will minimize the repetition of that type of accident.
- Report to the Chemical Hygiene Officer incidents that cause personnel to be seriously exposed to hazardous chemicals or materials, such as through the inoculation of a chemical through cutaneous penetration, ingestion of a chemical, or probable inhalation of a chemical, or that constitute a danger of environmental contamination.

Laboratory, SEF and Teaching Lab Supervisors

- Ensure that action is taken to correct work practices and conditions that may result in the release of toxic chemicals.
- Properly dispose of unwanted and/or hazardous chemicals and materials.
- Document and maintain compliance with all local, state and federal regulatory requirements.
- Make copies of the approved safety plan available to the program and support staff.

EHS Representative

- Assisting with contacting the CMSE EHS Coordinator and /or MIT EHS Office lead contact person or other MIT EHS Office designated team members for assistance with potentially hazardous materials and potentially hazardous activities.
- Assisting with providing or arranging for EHS training for personnel working in the laboratory/facility (including employees, students, and visitors).
- Assisting with disseminating EHS information to laboratory/facility personnel, including information on methods to reduce or avoid the use of potentially hazardous or toxic materials.
- Assisting with conducting brief inspections of the laboratory or facility for compliance with EHS Requirements.
- Assisting with evaluating and making recommendations on EHS issues that concern activities and materials in the laboratory/facility.

Employees, Staff and Students

- Understand and follow all Standard Operating Procedures.
- Understand all training received.
- Understand the function and proper use of all personal protective equipment. Wear personal protective equipment when mandated or necessary.
- Report, in writing, to your supervisor of any significant problems arising from the implementation of the Standard Operating Procedures.
- Report to your supervisor all facts pertaining to every accident that results in the exposure to toxic chemicals, and any action or condition that may exist that could result in any accident.
- Contact your supervisor, the Chemical Hygiene Officer, the EHS Coordinator, or the EHS Office if any of the above procedures are not clearly understood.

- Read and understand completely the Chemical Hygiene and Safety Plan
- Check periodically for updates
<http://web.mit.edu/environment/ehs/>
- Revise training status:
<http://web.mit.edu/environment/training/>
- Assist lab meetings, continuous safety training
- Keep safe practice