ISSUE

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**Laboratory Safety Compliance: Most Cited Issues in 2024**

*As most of you are aware, UO EHS conducts annual safety inspections for every laboratory and art studio on campus. These inspections are designed as collaborative check-ins to help you stay in compliance with university policies, regulatory requirements, and best practices. Here are the most frequent issues observed during the 2024 inspection cycle, along with context, relevant codes, and guidance for maintaining a safe and compliant lab environment.*

**1.) Training Not Documented – Found in 48% of Inspections 2.) Eyewash Not Flushed Weekly – Found in 35% of**

*Reference: OSHA Laboratory Standard (29 CFR 1910.1450), Oregon* **Inspections**

*OSHA (OAR) 437-001-0760, OAR 437-002-0360, UO Policy Reference: ANSI Z358.1-2014, OAR 437-002-0161, OAR 437-004-1305*

Documentation of safety training is essential to demonstrate that all lab Eyewash stations must be flushed weekly to ensure they are functioning personnel are prepared to handle hazards appropriately. Without properly and supply clean water in the event of an emergency. This task, records, labs cannot show compliance or institutional safety though often overlooked, is a critical part of emergency preparedness and expectations. required for regulatory compliance.

# Hazardous Waste Containers Not Tagged – Found in 34% of Inspections

*Reference: 40 CFR Part 262.11 (EPA RCRA Regulations), Oregon DEQ, Prudent Practices, Chapter 8, Section 8.B.6 and 8.B.2.2* Hazardous waste must be clearly labeled with the words “Hazardous Waste” and a start date to comply with federal and state regulations. Untagged containers can result in regulatory penalties and increased safety risks.

**5.) Aliquoted Stock Chemicals Improperly Labeled – Found 6.) Electrical Panels or Shut-Offs Obstructed – Found in 26% in 30% of Inspections of Inspections**

*Reference: Prudent Practices, Chapter 5, Section 5.D.6; Chapter 8, Reference: OSHA 29 CFR 1910.303(g)(1), OAR 437-004-1610, NFPA 70E Section 8.B.2.2; Chapter 6, Section 6.C.3, UO Chemical Hygiene Plan, 110.26A, Prudent Practices, Chapter 6, Section 6.C.3*

*Appendix D* All secondary containers, including small ones like dropper bottles or vials,

Secondary containers, including small ones like vials or dropper bottles, must be labeled with the chemical name and hazard information to must be labeled with the chemical name and hazard information to prevent accidental misuse and comply with labeling requirements. prevent misuse and meet labeling requirements. For very small However, for very small containers (e.g., 1.5 mL tubes) where space

containers (e.g., 1.5 mL tubes), the UO Chemical Hygiene Plan allows constraints make full labeling impractical, the UO Chemical Hygiene Plan for numbering or coding systems, as long as a key is accessible to lab allows for alternative labeling methods, such as numbering or coding personnel. systems, provided that a corresponding key or reference is readily

accessible to laboratory personnel. Click here to see a video of an electrical panel catching fire in the EMU.

# Waste Not Labeled with Common Chemical Names – Found in 33% of Inspections

*Reference: 40 CFR Part 262, Prudent Practices, Chapter 8, Section 8.B.4.1*

Using abbreviations or chemical formulas instead of common names may confuse emergency responders and waste handlers. Full chemical names are required for accurate hazard communication and waste disposal.

# Waste Containers Without Secondary Containment – Found in 23% of Inspections

*Reference: EPA RCRA Guidelines 40 CFR 267.195, UO Hazardous Waste Policy, Prudent Practices, Chapter 8, Section 8.B.4.1* Secondary containment is required to prevent spills and environmental contamination. It is especially critical when storing hazardous liquids near drains or in high-traffic areas.

# Empty Bottles Not Rinsed or Defaced – Found in 22% of Inspections

*Reference: UO Hazardous Waste Policy, Prudent Practices, Chapter 8, Section 8.B.3.4*

Empty containers should be properly rinsed (if appropriate) and labels defaced before disposal. This prevents confusion about contents and reduces hazardous waste misclassification.

# Heavy or Bulky Items Stored Above Eye Level – Found in 21% of Inspections

*Reference: OAR 437-004-1610, Prudent Practices, Chapter 3, Section 3.B.1.4*

Storing heavy or bulky items overhead creates a risk of falling objects and injuries. OSHA can cite this under the General Duty Clause if it's a recognized hazard that isn’t addressed.

# Lab Members Missing UO Fire Safety Training – Found in 20% of Inspections

*Reference: 2022 Oregon Fire Code 4.1, Prudent Practices, Chapter 6, Section 6.F*

Fire safety training is mandatory for lab personnel who work with flammable materials or are in fire-risk environments. This training helps prevent incidents and ensures compliance with fire code requirements.

Feel free to reach out with any questions or requests for assistance! Let’s work together for a safer campus!

**— UO Environmental Health & Safety**