Current Auto-Fail/Deal-breaker categories for FY17

Online Database Tool

Every lab must have an inventory of all hazardous chemicals and carcinogens used or stored in the laboratory. This list must be updated on a regular basis (at least yearly). Beginning July 1, 2011, you must use the online database tool provided by EH&S to maintain this inventory. Failure to meet this requirement will result in an automatic failure for the lab.

IBC protocol

If the lab works with recombinant DNA, infectious microorganisms, replication defective viral vectors, human or animal tissues or cell cultures, biological toxins, or hazardous chemicals in animals or tissue culture the lab must have an approved Recombinant DNA and Hazardous Research Materials Protocol. Failure to meet this requirement will result in an automatic failure for the lab.

Gross disregard for use of personal protective equipment (PPE)

Handling of hazardous chemicals must be done with care, especially when large volumes or amounts are involved. When handling any hazardous chemicals, appropriate personal protective equipment (e.g. gloves, eye protection, face shields, lab coats or gowns, closed-toe shoes) and engineering controls (e.g. fume hood) must be used. Disregard for use of personal protective equipment (PPE) will result in an automatic failure of the lab inspection.

Select Agent Toxins

Certain toxins are subject to Select Agent regulations. Registration with the federal government is not required for exempt quantities of these toxins, but registration with EH&S through a Recombinant DNA and Hazardous Research Materials Protocol is required regardless of quantity. All Select Agent toxins must be kept securely locked and a current, accurate inventory must be kept of acquisition, use, and disposal to ensure that the exempt quantity is never exceeded. Failure in any of these requirements will result in an automatic failure for the lab.

DEA Controlled Substances

Certain drugs (narcotic and non-narcotic) and chemicals fall under the jurisdiction of the Missouri Bureau of Narcotics and Dangerous Drugs (BNDD) and the US Department of Justice (DOJ) Drug Enforcement Administration (DEA). These drugs and chemicals are known as Controlled Substances and must be maintained under certain restrictions. These materials must be securely locked in a substantially constructed cabinet and access to these materials must be restricted to individuals who have completed a background check through HR. Initial and annual physical inventory reconciliations must be performed and current records of acquisition, use, and disposal must be maintained and readily retrievable. Failure in any of these requirements will result in an automatic failure for the lab.
**Food/Beverage Consumption**

Consumption of food and beverages in the lab presents a risk for ingestion of hazardous chemical, biological, and/or radioactive materials. To eliminate this risk, consumption and storage of food and beverages outside of approved locations (“Clean Areas”) is not allowed and will result in an automatic failure of the lab inspection. Since January 1, 2007, there are no approved areas for food and beverage consumption and storage within laboratories. Evidence of food consumption will result in an automatic failure for the lab.

**Unwanted Material/Hazardous Waste Management**

Regulatory agencies place great importance on the proper disposal of unwanted material/hazardous waste. To assist labs in maintaining compliance in this area, EH&S has highlighted the following areas of our lab inspection form. Failure of any of these items will result in an automatic inspection failure.

Improper disposal or management of unwanted material/hazardous waste, including:

a. Uncapped containers.

b. Improper labeling of containers (e.g. missing label, label not completely filled out, failure to add start date to label).

c. Containers with a start date greater than the regulatory time limit.

**Sharps**

Improper disposal of metal sharps in the regular trash presents a risk to laboratory and custodial workers, while disposal into a biohazard waste container not specifically designed and approved for sharps disposal poses a risk to laboratory workers and waste handlers. Improper disposal of metal sharps into either of these containers will result in an automatic failure of the lab inspection.