

# Harvard University Laboratory Personal Protective Equipment (PPE) Policy

## I. SCOPE/APPLICABILITY

This Policy establishes the required use of Personal Protective Equipment (PPE) in all University research, teaching and conservation laboratories, but excludes computational laboratories. The intent of this policy is to provide baseline requirements for PPE assessment, use and review, and to provide guidance to ensure that existing local policies and programs (e.g. Radiation Protection Program, IACUC, COMS registration and risk assessment process, etc.) meet or exceed the requirements described below.

## II. REQUIREMENTS

Harvard University is committed to providing a healthy and safe working environment for all members of the campus community. It is University policy to comply with all applicable health, safety, and environmental protection laws, regulations and requirements. The Occupational Safety and Health Administration (OSHA) promotes workplace safety through the promulgation and enforcement of federal regulations. Regulations referenced in Section IV of this Policy address all types of PPE, including eye, face, and head protection, protective clothing, respiratory protection, and shields and barriers for protection from chemical hazards, radiological hazards, bloodborne pathogens or other potentially infectious biological materials, recombinant microorganisms, and other process hazards.

The general regulatory requirements regarding the use of PPE in research, teaching and conservation laboratories are listed below.

1. Conduct an assessment to determine PPE requirements for various laboratory activities.
2. Inform laboratory personnel of all PPE requirements within their laboratory, and how to obtain, correctly use, store and dispose of PPE (where applicable).
3. Provide any required PPE to laboratory personnel at no cost to those personnel.
4. Ensure that all laboratory personnel follow all PPE requirements.
5. Conduct periodic (at least annual) assessments to ensure PPE requirements are still appropriate for present activities.

In order to meet these regulatory requirements, and in an effort to prevent workplace injuries and illnesses, Harvard has established this Policy on PPE use in laboratories for all faculty, staff and students working in campus research, teaching and conservation laboratories. The specific requirements of this Policy are listed below.

1. Each Principal Investigator (PI) or his/her designee must complete a Laboratory Personal Protective Equipment Assessment (LPPEA) for his/her laboratory. The PI/designee must ensure any required PPE is purchased and available for use by laboratory personnel.
2. The PI/designee must keep in the laboratory a copy of the LPPEA (on the checklist referenced in Section V below or on records developed by the laboratory documenting an equivalent PPE assessment process) and must review it with each laboratory researcher as part of his or her Laboratory-Specific Safety Review. During this review, the researcher must be informed of all PPE requirements within the laboratory, and instructed how to obtain, correctly use, store and dispose of (where applicable) all PPE. The appropriate box on the Laboratory-Specific Safety Review should be checked upon completion of this PPE review.
3. Each PI or his/her designee must review the LPPEA at least annually, and additionally when significant changes in processes and/or materials use occur. In addition, the Department of Environmental Health, Safety and Emergency Management (EHSEM) staff shall review the LPPEA as part of programmed laboratory inspections.

### III. RESPONSIBILITIES

Preventing workplace injuries and illnesses is the responsibility of every member of the campus community. Specific responsibilities are assigned to higher-level members within the research and teaching community in order to implement and ensure compliance with this Policy by their subordinate staff. Reports of noncompliance with this Policy must be sent to the next higher-level member of the campus community for review and possible enforcement action.

1. The Environmental Safety Compliance Officer (ESCO) is responsible for reporting annually to the Office of the Provost and the cognizant Dean about the school's compliance with the Policy. The Office of the Provost will review the University-wide aspects of the report and will, together with school leadership, reinforce the University's commitment to safe laboratory practices.
2. The University Lab Safety Committee is responsible for promoting a safe working environment in all research and teaching laboratories on campus.
3. Department Chairs, Lab Directors, Research Operations Managers, Department Administrators, or other designated department managers are responsible for communicating, promoting and enforcing the Policy in their respective research and teaching areas.
4. Principal Investigators and designated laboratory management staff (e.g., Lab Managers or Lab Safety Coordinators) are responsible for complying with this Policy and ensuring that their staff receive appropriate training and comply with this Policy as it relates to their research, teaching, and conservation activities.
5. All staff members working in laboratory areas are responsible for following laboratory safety requirements and for wearing any PPE specified in the LPPEA completed by their laboratory.
6. EHSEM is responsible for assessing laboratory performance by conducting periodic surveys of LPPEA records and PPE use, as well as, by providing additional technical assistance to PIs in their enforcement of this Policy.

### IV. REFERENCES

1. [Harvard University Environmental Health & Safety Management Policy](#)
2. Code of Federal Regulations, [Title 29 CFR, Part 1910, Subpart I, Personal Protective Equipment](#)
3. Code of Federal Regulations, [Title 29 CFR, Part 1910, Subpart Z, Section 1450, Occupational Exposure to Hazardous Chemicals in Laboratories](#)
4. Code of Federal Regulations, [Title 29 CFR, Part 1910, Subpart Z, Section 1030, Bloodborne Pathogens](#)
5. Centers for Disease Controls and Prevention, [Biosafety in Microbiological and Biomedical Laboratories, 5<sup>th</sup> Edition](#)
6. National Institutes of Health [Guidelines for Research Involving Recombinant DNA Molecules](#)
7. [Harvard University Radiation Safety Manual](#) Approved September 17, 2002 [MA Radiation Control Program Radioactive Material License 44-0002]

### V. ASSOCIATED DOCUMENTS

The following associated documents (or equivalents) shall be used to implement this policy:

- [Harvard University Laboratory Personal Protective Equipment Assessment \(LPPEA\) Tool](#)
- [Harvard University Laboratory-Specific Safety Review Checklist](#)