



## Safety and Risk Management

### Clean Area Designation in Laboratories

1. **PURPOSE:** The purpose of this document is to describe the eligibility requirements and application process for obtaining a clean area designation in laboratories where potential biological, chemical, or physical hazard exposure risks exist and facility space limitations require a break area be designated in the active laboratory work area.

2. **SCOPE/APPLICABILITY:** Principal Investigators (PIs) use this document to determine if his or her laboratory is eligible for a clean area designation and, if eligible, the process for obtaining a clean area designation.

3. **BACKGROUND:** Eating, drinking, handling contact lenses, applying cosmetics, and storing of food for human consumption is not permitted in university laboratory work areas (operating at Biosafety Level 1 (BSL-1) or Biosafety Level 2 (BSL-2) or where hazardous chemicals are used) according to the Centers for Disease Control and Prevention (CDC) Biosafety in Microbiological and Biological Laboratories (BMBL) guidelines, the Occupational Health and Safety Administration's (OSHA) Bloodborne Pathogen and Laboratory Safety Standards, and VCU's Biosafety Manual and Exposure Control and Chemical Hygiene Plans. The BMBL further clarifies that food must be stored outside of university laboratory work areas in cabinets or refrigerators which are designated and solely used for this purpose.

In cases where the need is justified (i.e. existing break facilities are not convenient) and it can be demonstrated that proposed locations are sufficiently separated from actual laboratory work areas, the Chemical Biological Safety Committee (CBSC) will consider approving a designation of a "Clean Area" where laboratory staff may eat, drink, apply cosmetics, and conduct other personal activities not related to lab operations. The VCU Biosafety Office, under the purview of the Chemical/Biological Safety Committee (CBSC), reviews and approves / disapproves the Clean Area designation.

#### 4. ELIGIBILITY

A. **Eligible Laboratories:** Facilities which may qualify for clean area designation include laboratories operating under BSL-1 and BSL-2 and/or laboratories whose operations involve hazardous chemicals under the following conditions:

1) The PI has an approved/active Memorandum of Understanding & Agreement (MUA) registered with the CBSC if biological hazards are used. (Note: If the clean area designation is approved, it will need to be incorporated into the MUA.)

2) The laboratory has space available which provides sufficient separation from laboratory work areas where active use/storage of the biological/chemical hazards is taking place. Adequacy of "sufficient separation" is determined by the Chemical/



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Biological Safety Section (CBSS) staff via the completed hazard assessment and facility inspection.

3) The lab possesses suitable engineering controls for minimizing contamination (biological safety cabinets and/or fume hoods, properly placed sinks for hand washing, nonporous chemical resistant and readily cleanable lab/equipment surfaces, etc.).

4) The PI provides a completed hazard assessment identifying potential chemical or hazard exposure routes, potential for lab staff acquiring laboratory acquired infection (LAI), potential severity of LAI or hazards associated with chemical exposures, and means for minimizing potential staff exposure through personal protective equipment, engineering controls, administrative controls, and staff training.

5) The PI/RO provides justification for establishing a clean area within the space under their charge. Only applications which clearly demonstrate that existing facilities do not provide a convenient break area for laboratory staff will be considered.

### B. Ineligible Laboratories:

1) Laboratories operating under BSL-2+ or greater level of precaution.

2) Laboratories where OSHA controlled chemicals are used.

3) Spaces where research animals are housed and/or procedures with research animals take place to include "out-of-vivarium" studies.

4) Spaces used for treatment and/or staging of (biohazardous) regulated medical waste (RMW).

## 5. APPLICATION PROCESS

A. If eligible, complete the Clean Area Designation application. The application form is available on the this website.

B. Send the completed application via Campus Mail to CBSS (PO Box 980112) or by FAX (828-1157). If you wish to use email to return the completed application, call CBSS at 828-1932 to obtain the email address.

C. CBSS will contact the applicant to conduct a pre-review and schedule a facility inspection.

D. Upon completion of the pre-review and facility inspection, the CBSS representative will submit the application to the CBSC.



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E. CBSC will review processed Clean Area Designation requests and approve or disapprove the request at their quarterly meetings. The CBSC meetings are held on the 3rd Thursday of March, June, September and December and are open to the public. Contact CBSS for time and location of the quarterly meeting.

F. Approved Clean Area Designations are to be incorporated into the PI's MUA or maintained with the Chemical Hygiene Plan for labs that do not use biological hazards.

- 1) Following notification of CBSC approval, PI's will clearly mark the floor areas forming the borders of the clean area with tape or through other means.
- 2) Approved clean area designation will be reviewed on a three-year cycle (concurrent with the MUA). Labs that do not use biological hazards will be reviewed annually.
- 3) Annual Laboratory Assessments conducted by CBSS staff verify that the conditions of the clean area designation are being followed and that laboratory and clean areas are being maintained in suitable order.
- 4) If the PI fails to uphold the conditions of the clean area designation, significant violation of the protocols established under the MUA, and/or significant safety violations are noted during annual laboratory assessments, CBSS Staff will suspend the clean area designation and report the suspension to the CBSC.

### 6. REFERENCES:

- a. Biosafety in Microbiological and Biomedical Laboratories (BMBL), 5th Edition
- b. Bloodborne Pathogen Standard (1910.1030)
- c. Laboratory Safety Standard (1910.1450)
- d. Biosafety Manual
- e. Exposure Control Plan
- f. Chemical Hygiene Plan