



TEXAS TECH UNIVERSITY™

Office of the President

May 30, 2012

Christina Morgan, MPH  
Recommendations Specialist  
U.S. Chemical Safety and Hazard Investigation Board  
2175 K Street NW, Suite 400  
Washington, DC 20037

VIA e-mail to Christina.Morgan@csb.gov

**RE: Rec. Nos. 2010-5-I-TX-R3&4**

Dear Christina:

On April 5<sup>th</sup>, 2012, you contacted Dr. Taylor Eighmy about the status of our efforts around the two recommendations that you have given us. He responded back to you on April 11<sup>th</sup>, 2012 with a very brief update, promising to provide a more detailed response to you in the near term. This letter today from me is that more detailed response.

Thank you for the opportunity to provide information about our work on the U.S. CSB recommendations 2010-5-I-TX-R3 and R4. I also would like to update you on those additional requirements that I imposed on Texas Tech University (TTU) in parallel with your recommendations.

**U.S. CSB Recommendation no. 2010-5-I-TX-R3:**

*Revise and expand the university chemical hygiene plan (CHP) to ensure that physical safety hazards are addressed and controlled, and develop a verification program that ensures that the safety provisions of the CHP are communicated, followed, and enforced at all levels within the university.*

The work around this recommendation is ongoing. Environmental Health & Safety (EH&S) staff have drafted an extensive revision of the CHP to include physical safety hazards and will submit it to the newly constituted Institutional Laboratory Safety Committee (ILSC) at its next meeting. After ILSC input, the revised CHP will be distributed to academic departments and facilities units for input and additional revision. Electronic information about revision of the CHP and opportunities for input will be distributed campus-wide by the Office of the Vice President for Research (OVPR) media group. Due to academic schedules, we expect the revision process will continue into the fall semester. To initiate a verification program, all units with laboratories, studios, or large equipment now have appointed chemical hygiene officers, with initial training provided by the Laboratory Safety Institute (LSI). We will rely on the ILSC and the departmental chemical hygiene officers to verify that safety provisions of the CHP are communicated, followed, and enforced at all levels within the university.

**U.S. CSB Recommendation no. 2010-5-J-TX-R4:**

*Develop and implement an incident and near-miss reporting system that can be used as an educational resource for researchers, a basis for continuous safety system improvement, and a metric for the university to assess its safety progress. Ensure that the reporting system has a single point of authority with the responsibility of ensuring that remedial actions are implemented in a timely manner.*

The work around this recommendation is also ongoing. The ILSC is awaiting input from the American Chemical Society Working Committee on incident and near-miss reporting to finalize its recommendations for research laboratories. EH&S has maintained its database of campus incidents and piloted an incident reporting system for teaching laboratories within the Department of Chemistry and Biochemistry. The Provost and the Senior Vice President for Research will ensure that all units with laboratories, studios, or large equipment have functioning safety committees that are instructed to use the incident reporting system. Our recommendation that safety be included in faculty annual evaluations has been discussed extensively by the Faculty Senate; these discussions will continue in the next academic year. The OVPR media group has mocked up a “*Safety @ TTU: Lessons Learned*” website, available from the OVPR and EH&S pages; release is expected this month.

**Texas Tech University Self-imposed Requirements:**

1. **Adapt elements of physical risk into our chemical hygiene plan.**

The working draft of the TTU CHP includes physical hazards.

2. **Require Texas Tech University to become an exemplary institution around the culture of safety.**

During AY 11-12, trainees required to complete Responsible Conduct of Research training could meet 4 of their 6 required hours by participation in face-to-face safety training offered by LSI.

3. **Require the University to report annually to the U.S. CSB about progress made toward improving the culture of laboratory safety; the parameters will need definition.**

The ILSC will take the lead to identify reporting parameters.

4. **Establish a TTU Faculty Chemical Safety Committee to help firmly establish the culture of laboratory safety.**

The ILSC was established in AY11-12, chaired by a faculty member with experience in a national laboratory. The ILSC is developing a protocol system for work with hazardous chemicals and to increase investigator accountability for laboratory procedures.

**5. Acquire an online chemical inventory system.**

An online chemical inventory system (EH&S Assistant) was in place in 2010, and purchasing requirements were changed so that all chemical purchases are routed through EH&S. EH&S staff have established access IDs for faculty and students in laboratories and studios that use chemicals, and developed a spreadsheet to allow faculty to transfer Excel-based inventories. Faculty has been slow to enter their chemical inventories. Therefore, we have opened an additional laboratory safety position to hire an individual to enter inventories in individual labs. EH&S has submitted specifications for a centralized chemical receiving process to TTU purchasing. Specifications include a barcode system to enter all incoming chemicals (whether for academic, residential services, or physical plant use) into EH&S Assistant.

**6. Require the Provost and the Vice President for Research to make laboratory safety an element of annual evaluations (e.g., college, department, and faculty).**

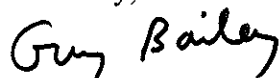
The Research Subcommittee of the Faculty Senate has recommended that addition of safety information to faculty annual reports be preceded by establishment or reinvigoration of faculty safety committees in all departments that house laboratories, studios, and/or heavy equipment. The Senior Vice President for Research and the Provost will communicate this requirement, and information about how safety will be incorporated into the evaluation process for colleges, departments, and graduate programs, to the Deans.

**7. Others to be determined.**

No other recommendations have been brought forward at this time.

Please know that as president, I remain fully committed to making TTU an exemplar for embracing laboratory safety. We will continue to apprise you as we complete our near term efforts and continue to focus on making laboratory safety continuously part of the culture of scholarly excellence here at Texas Tech University.

Sincerely,



Dr. Guy Bailey  
President

cc: Dr. Taylor Eighmy, Senior Vice President for Research  
Dr. Bob Smith, Provost and Senior Vice President for Academic Affairs  
Mr. Kyle Clark, Vice President for Administration and Finance  
Dr. Alice Young, Associate Vice President for Research  
Mr. Ronald Phillips, University Counsel  
Mr. Cliff Harris, Interim Director for EH&S  
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