EHS review of Institutional Animal Care and Use Committee (IACUC) Appendix G

* When reviewing an Appendix G, EHS’s primary concern is the safety of all personnel who may potentially be exposed to hazardous material and the appropriate disposal of the hazardous material to protect the environment.
* The United States Department of Labor, Occupational Health Safety Administration (OSHA), has a [Hazard Communication Standard](https://www.osha.gov/dsg/hazcom/index.html) that requires workers be made aware of any hazards associated with chemicals before work begins.
* [University Policy 1005](http://www.policies.vt.edu/1005.pdf) – states responsibility of the Principal Investigator (PI) to identify hazards, potential exposures and to take all reasonable steps to mitigate such exposure as outlined in [EHS Safety and Health Guidelines for Educational and Research Activities](https://www.ehss.vt.edu/uploaded_docs/201710021119450.Guidelines%20Safety%20Research%20and%20Education%20Revision%201.1.pdf)
* [EHS Safety and Health Guidelines for Educational and Research Activities](https://www.ehss.vt.edu/uploaded_docs/201710021119450.Guidelines%20Safety%20Research%20and%20Education%20Revision%201.1.pdf) outlines the responsibility of the PI. These include, but are not limited to, performing a preliminary risk assessment, developing standard operating procedures and providing training to all employees and students on the hazards present in the workplace.

**PROCESS:**

* EHS reviews groups of Appendix G’s every two weeks.
* Please provide as much specific information, in Appendix G, about the hazardous substance as possible to expedite the approval process
	+ - For assistance review the following documents: [EHS Flow Chart](https://www.ehss.vt.edu/detail_pages/document_details.php?s_document_title=Flow&document_id=615), [Chemicals in Animals Chart](https://www.ehss.vt.edu/detail_pages/document_details.php?s_document_title=chemicals+in+animals+chart&document_id=600)
		- Please use the newest version of Appendix G (download the most current version from the online system during submission).
		- Enter the specific manufacturer’s name of substance (no abbreviations, codes, etc.).
		- Excretion information if known.
		- Personal Protective Equipment (PPE)
		- SDS hazard classification(s) for the exact concentration/dilution you are giving the animal (see Section 2 of SDS).
			* If SDS for exact concentration is not available then use information from a SDS for the closest concentration of the chemical.
	+ Dosage to be administered.
	+ Please review the most recent SDS so you place the substance in the correct section of Appendix G.
	+ Some questions in Appendix G are applicable for work with small lab animals (rodents).
		- Please answer all questions or put N/A if it does not apply to your situation.
* EHS reviews the SDS you provide to determine if the substance is considered hazardous
	+ Please provide the most recent SDS for the exact substance and concentration you are administering, under supporting documents, during IACUC protocol/amendment submission.
	+ Information about locating SDS’s can be found at: <https://www.ehss.vt.edu/detail_pages/document_details.php?s_document_title=SDS&document_id=531>
	+ Unless you provide EHS with the most recent SDS for the specific concentration of substance you are administering EHS will determine if the substance is hazardous or not based on the closest SDS they can locate.
	+ Please note that commercial products and/or veterinary approved substances maybe considered hazardous and appropriate safety information must be provided to all personnel potentially exposed to the material.
	+ If substance(s) have been classified by FDA as generally recognized as safe (GRAS) they will be considered non-hazardous. All labeling safety precautions must be followed.

**Hazard Assessment and Other Safety Documentation:**

# Before any work begins in the lab or animal facility, Principal Investigators are responsible for informing research staff and the animal care staff of hazards [based on Safety Data Sheets (SDS) and other resources] associated with substances they will work with or be potentially exposed.

Different types of animal research spaces have specific requirements for using chemicals. The following table summarizes those requirements for each type of research space.

|  |  |  |  |
| --- | --- | --- | --- |
|  |  |  | **PI /Designee Completes & Maintains:** |
| **Type of Research Space** | **Location** | **PI/Designee Performs** [**Hazard Assessment**](https://www.ehss.vt.edu/programs/haz_assess_intro.php)**\* and Completes Appendix G\*\*** | * **HazCom Plan**
* **Facility-specific SOPs (if required)**
* **SDS Management**
 | * **Chemical Hygiene Plan**
* **Lab-specific SOPs**

 **(if required)*** **SDS Management**
 |
| Animal Facilities | Vet MedLS1ILSBVTCRI | Yes | Yes | No |
| Labs where animal research is conducted (Use of snakes, frogs, salamanders etc.) | Derring HallNorris Hall | Yes | No | Yes |
| Vivariums | Derring HallLitton-Reeves Hall | Yes | Yes | No |
| Farms | Kentland/ Swine Center/ Moore Farm/ Sheep Center/ Mare Center/ Beef CattlePoultry/Turkey/Bear Center/ Aquaculture/ARECSs/EMC | Yes | Yes | No |

**\*** [Hazard assessment training](https://www.ehss.vt.edu/detail_pages/training_details.php?training_id=4476), available online on the VT EHS website is highly recommended for all faculty conducting animal research. Guidance on conducting hazard assessments is also available [online](https://www.ehss.vt.edu/programs/haz_assess_intro.php).

**\*\*** In many cases, the Appendix G form may also serve as the SOP.