



Research & Laboratory Safety Policy

New Mexico Tech Office for Research

Last Modified May____, 2024

I. Introduction

Purpose

The New Mexico Institute of Mining and Technology (“the University” or “NMT”) is committed to providing a safe and healthy work, educational, and living environment, to having a positive impact on the natural environment, and to protecting the University’s employees, students, physical resources, and financial assets. To help achieve these goals, the University has established a safety and loss prevention and control program administered in accordance with state requirements. Participation in the loss prevention program is University-wide.

The purpose of this policy is to provide a general safety framework for research and laboratory activities at NMT. The goal of this policy is to reduce injuries, illnesses, and property damage at NMT along with University-wide compliance with local, state and federal regulations, laws, statutes, rules, and best management practices.

Scope

This policy applies to all members of the NMT community including administrators, faculty, staff, students, researchers, visitors, volunteers, and all other individuals when working in any satellite center, institute, or site owned, operated, managed, or controlled by NMT, or when participating in NMT-sponsored field activities. The remainder of this document will refer to these individuals as “member(s)”. This document seeks to establish guidelines during regular operations and during campus transitions, such as staff changes, changing research objectives, and technological innovations.

Department and Research Center safety policies may be more restrictive or more detailed based upon specific operational needs. Other safety policies related to research shall be reviewed for consistency with this policy.

Core Policy

NMT is committed to providing a safe and healthy environment for employees, students, and visitors. NMT complies with local, state and federal regulations, laws, statutes, and rules, including those issued by the State of New Mexico. NMT adheres to best management practices aimed at reducing accidents that lead to injuries, illnesses, and property damage. NMT follows the approved guidelines provided by its Research Division, through its Office of Research Compliance and Safety.

II. Definitions

Committee for Safety in Research (CSR)

Subcommittee of the New Mexico Institute of Mining and Technology Loss Prevention and Control Committee.

Laboratory

Laboratories as defined in this policy refer to any research or instructional room, space, or area from which the primary use includes handling potentially hazardous materials, including but not limited to handling chemicals, aerosols, biological organisms, radioactivity, ionizing radiation, non-ionizing radiation (such as lasers and RF sources), energetic materials, flammable materials, or physical/mechanical hazards such as saws or heavy equipment.

Loss Prevention and Control Committee

Committee established to review and prevent losses and safety concerns as required by the New Mexico Administrative Code and NMT's Loss Prevention and Control Plan. The Loss Prevention and Control Committee is led by the NMT Loss Prevention and Control Coordinator.

NMT Research

NMT Research means a systematic investigation designed to develop or contribute to generalizable knowledge, including basic and applied investigations and product development, that is:

- Funded by or through NMT (including outside sponsored funding);
- Conducted at NMT, regardless of funding; or
- Non-sponsored and conducted off campus by or under the direction of NMT employees within the scope of their NMT employment.

Office of Research Compliance and Safety

Operating under the direction of the NMT Research Division, this office monitors regulations, laws, rules, agency directives required to participate in the research enterprise. Establishes and monitors compliance with policies, procedures, licenses and required reporting.

Radiation Safety Committee (RSC)

Committee to establish and review radiation safety measures in consultation with the Radiation Safety Officer, as required by the New Mexico Environment Department Radiation Control Bureau.

III. Roles and Responsibilities

Responsibility for safety cannot be delegated to any one Department and must be assumed by every member of the University community. All members at NMT are responsible for:

- Following all NMT safety and health policies, programs, and operational procedures.
- Participating in all necessary, mandatory, and assigned safety and health training programs and assessments.
- Reporting any safety and/or health hazards or violations to their appropriate supervisors.

Specific roles and responsibilities are defined as follows:

A. Regents

1. Review and approve safety policies when appropriate under existing NMT Policy.

2. Ensure adequate safety resources and infrastructure are provided by the institution.

B. President and Vice Presidents

1. Direct and support NMT-wide compliance with all safety-related local, state, and federal laws and regulations.
2. Provide appropriate infrastructure and allocate sufficient resources for NMT safety-related programs and activities.
3. Facilitate safe practices and culture in all operational NMT activities.
4. The Office for the Vice President for Research oversees the Office of Research Compliance and Safety and ensures that the staff of that office has adequate technical training and education in the areas they regulate and/or access to the necessary subject matter experts.

C. Human Resources

1. Provides information to new staff during orientation regarding institutional safety culture and where to get assistance with safety questions and issues.

D. Deans, Department Chairs, and Center, Institute and Division

Directors

1. Ensure that all department faculty, students, and employees follow the NMT safety policy.
2. Implement timely and appropriate actions to correct all identified safety deficiencies.
3. Ensure the department/division safety guides are followed and updated annually.
4. Serve as the default point of contact with the Office of Research Compliance and Safety regarding safety matters, and may appoint and empower department/division safety liaison(s) to facilitate communication between their department or division and the Office of Research Compliance and Safety. Safety duties include:
 - a) Maintain working knowledge of department/division facilities, and actively engage and advocate for safety improvement.
 - b) Ensure departments and divisions are aware of safety training requirements and resources.
 - c) Assist with and participate in laboratory inspections and with implementing recommendations that result from inspections.

E. Faculty, Instructors, Principal Investigators, and Supervisors

1. Safety in laboratories and field activities is the responsibility of the “responsible person” for the activity. This individual may be a faculty member, instructor, Principal Investigator for the grant activity, or a designated supervisor.
2. The Responsible Person is responsible for the safety of areas, students, and staff under their supervision (but this does not remove the responsibility of the Principal Investigator).

3. The Responsible Person ensures appropriate safety training for their employees and students who are working in spaces under their direct supervision.
4. The Faculty, PI, or supervisor shall maintain appropriate documentation of safety training and procedures for laboratory and field activities.

F. All other employees, students, and visitors, including independent contractors

1. Follow all applicable safety policies, regulations, programs and procedures as provided by their supervisors, PIs, and the Compliance and Safety Division.

G. Office of Research Compliance and Safety

1. Provide research and laboratory safety guidance and basic safety trainings.
2. Provide technical support.
3. Provide consultations and evaluations of safety programs.
4. Provide waste disposal services.
5. Facilitate communication with state and federal regulators as needed.
6. Maintain up-to-date knowledge of rules and regulations and maintain an appropriate level of technical expertise, or access to necessary expertise, among staff to convey information to the NMT community in a timely manner.
7. Inspect laboratories and related facilities.
8. Conduct accident investigations and provide reports.
9. Ensure correction of safety deficiencies through appropriate follow-up.
10. Maintain records, including backup records, pertaining to the points above.
11. Notify members when safety training needs to be updated.

H. Loss Prevention and Control Committee

1. Perform duties related to implementing the loss prevention and control program, as required by the New Mexico Administrative Code 1.6.4. Duties include analyzing insurable losses and recommending and implementing changes to prevent recurrence.

I. Committee for Safety in Research (CSR)

1. Establish, evaluate, and recommend improvements to NMT research safety policies and activities, including procedures and best practices.
2. Review safety infractions and incidents.
3. Provide recommendations to NMT administration regarding safety infractions, safety incidents, and campus-wide safety needs and interests.
4. Recommend and promote safety training and topics.
5. Compile and recommend safety resources related to specific subject areas.
6. Create a bridge for dialogue between faculty, staff, and the Compliance and Safety Division with the goal of enhancing research safety.

7. Report to NMT's Loss Prevention Committee at least annually.

J. Radiation Safety Committee (RSC)

1. Provide support and recommendations to the Radiation Safety Officer (RSO).
2. Meet at least bi-annually, or as dictated by the New Mexico Radiation Control Bureau.
3. Help establish NMT policy in accordance with the Radiation Control Bureau.
4. Review and recommend approval of Radiation User Authorization requests.
5. Create, evaluate and update an NMT Radiation Safety Manual as necessary.
6. In consultation with the RSO, set frequency of required safety training.

IV. Policy Compliance

Violations of this policy may be referred to the cognizant supervisor, chair, dean or director for disciplinary action, consistent with NMT disciplinary policy.

Pending Final Approval