



Princeton University



**Laboratory Safety
Management
for
Research Faculty &
Lab Managers**



A publication of the
Princeton University Office of
Environmental Health and Safety

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2018

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Introduction

This document is provided to all newly hired faculty and laboratory managers who serve as principal investigator and/or supervise research laboratories.

The booklet serves as a resource to assist the key laboratory staff in carrying out their duties as supervisors of research personnel and spaces in accordance with policy set forth by the University Research Board and the Dean for Research.

Key expectations for leaders in the lab:

- Safety culture begins and is nourished by your role as supervisor.
- The University has expectations of you - do or delegate.
- Understand the responsibilities outlined as part of the OSHA Lab Standard.
- You are responsible for the people and materials in your laboratory. (This may include civil and criminal liability.)

We believe that by encouraging you to think about managing your laboratory in a safe manner, it will help improve health and safety at all levels in your lab.

"As education institutions and research universities, faculty across the nation should be at the forefront of embracing this culture of safety and adopting or developing best practices that makes this culture foundational to each of our institutions.

"We ask that all academic institutions look beyond the traditional research lab to embrace a commitment to improving safety in the lab, in the teaching classroom, and in the field."

- APLU Taskforce on Laboratory Safety

EHS Services

The EHS staff works in a coordinated effort to address health and safety issues in several broad areas: workplace safety, chemical safety, radiation safety, and biosafety and sanitation.

Workplace Safety encompasses many programs geared toward ensuring a safe workplace for all employees with one goal: to reduce work-related injuries and illnesses.

Chemical Safety and Industrial Hygiene is focused on the recognition, evaluation and control of health hazards related to use of chemical and physical agents, including noise.

Laboratory and Research Safety provides training, information, consultation, support and equipment to help researchers work safely in the laboratory.

Radiation Safety provides services related to the use of radioactive materials, radiation-producing machines, and various types of non-ionizing radiation sources (ultraviolet, magnetic, and radiofrequency emitters)

Biosafety and Environmental Programs provide services related to the prevention of illness associated with exposure to microorganisms/infectious agents and contaminants present in building materials and the environment.

Regardless of the type of research work you do, whether on or off campus, EHS is here to assist you with evaluation and control of hazards in your workplace.

Safety Culture at Princeton

Personal safety and health, as well as environmental stewardship, are core values of the university. EHS is committed to supporting that culture where the values of safety and health are adopted and practiced throughout all levels of the University.

The PI sets the tone for safety in the lab. The PI is expected to carry out duties as supervisor of their individual lab and establish a safe, compliant atmosphere by stressing the importance of safety in the lab and through leading by example.

All faculty, staff and students have important roles to play: ensuring people under their direction have all they need to work and study safely; ensuring good judgment is exercised while adhering to environmental health and safety precautions; making sure the group looks out for each other to avoid injuries, illnesses and environmental harm; reporting incidents, near-misses or any concerns to supervisors.

Faculty, staff and students are responsible for:

- adhering to all University and departmental or office safety policies and procedures and complying with safety directives issued by their individual supervisors;
- complying with the applicable provisions of health and safety standards and regulations promulgated by regulatory agencies;
- attending required training;
- raising safety concerns.

To reiterate, individuals with specific safety questions or concerns are encouraged to raise them with their immediate supervisor. Dealing with safety issues through the supervisory chain of command is the preferred method; however, when

this approach is unsuccessful in resolving a safety issue, you may contact a member of the EHS staff directly.

Safety Committees

Safety committees are in place to aid lab supervisors in their efforts to maintain a safe environment. The following list comprises the various safety committees and describes their role in the University health and safety framework.

The **Environmental, Safety and Risk Management Committee** (ESRM) develops policies and procedures to improve oversight of safety and risk management. Areas of focus include: occupational health and safety, laboratory safety, public safety (including visitors and contractors), fire safety, building security systems, fleet safety, pedestrian safety, campus events, and environmental stewardship.

The **Radiation Safety Committee** (RSC) is a subcommittee of ESRM. The RSC is responsible for oversight of the University's radiation safety program, grants authorization to principal investigators and other senior staff members who plan to work with radioactive materials, reviews incidents involving radioactive materials, sets policies for the use of sources of radiation and gives general supervision to the implementation of those policies.

The RSC is chaired by a senior faculty member and is comprised of various faculty members, the Director of Environmental Health and Safety, the University Radiation Safety Officer and other relevant personnel.

The **Institutional Animal Care and Use Committee** (IACUC) provides supervision, coordination, and review of every project proposed to include the use of vertebrate animals. IACUC has the authority to approve, modify or prohibit proposed

activities involving vertebrate animals. The Institutional Animal Care and Use Committee is administered by Research Integrity and Assurance (RIA).

The **Institutional Biosafety Committee** (IBC) provides review and oversight of all University research and teaching activities conducted by faculty, staff, students and/or visiting scientists that involve the use of biological agents. Biological agents include recombinant DNA molecules as defined by the National Institutes of Health (NIH) Guidelines for Research Involving Recombinant DNA Molecules (NIH Guidelines), infectious and potentially infectious agents, human and non-human primate materials, and biological toxins.

Princeton University's biological safety program is managed by EHS. The IBC is administered by Research Integrity and Assurance.

The **Safety Managers Group** is comprised of personnel from various University departments who serve as safety liaisons. Members of the group work directly with EHS to help facilitate safety initiatives within their departments. The group meets regularly throughout the academic year to review policy, incidents and near-misses and compliance trends.

Several research departments maintain **Department Safety Committees** comprised of students, faculty and staff. Such committees are encouraged and meet during the academic year to discuss health and safety topics specific to the department.

Making Notifications

Certain events that occur in the lab require notifications to various University departments who have response or regulatory reporting responsibilities. Contact EHS to report chemical spills, potential chemical exposure, releases to the envi-

ronment or any time you need assistance or consultation.

Contact EHS during weekday working hours by phone at 609-258-5294 for immediate assistance, or by email at ehs@princeton.edu. EHS is available for consultation off hours through DPS. Contact DPS at 609-258-1000 to reach EHS any time.

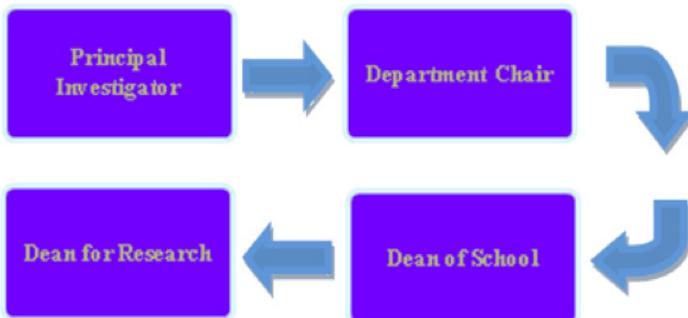
Notify the Department of Public Safety (DPS) for security concerns, suspicious behavior and for 24/7 response during an emergency.

In case of emergency, contact DPS by dialing 911 from an office or other campus phone, or by dialing 609-258-3333 from a mobile phone. For non-emergency assistance or to consult DPS, dial 609-258-1000.

Escalating Concerns

When an instance of non-compliance is observed in the research laboratory EHS will always counsel the individual directly involved in the incident. Depending on severity, EHS will often follow up with the PI to make them aware of the issue. EHS expects the PI to take action to ensure the lab staff understand the importance of compliance.

An escalation process is followed when repeated issues are observed and the PI does not take appropriate action to correct the behavior/issue.



Safety Training

It is the responsibility of the PI to ensure that members of the lab group receive the safety training required and appropriate for the research activities to be conducted.

All individuals working in Princeton University laboratories, paid or unpaid, including faculty, staff, students and visitors, must attend **Laboratory Safety Training** provided by EHS. Attendance at similar laboratory safety training provided by other institutions does not satisfy this requirement.

This training session covers the elements of the federal OSHA Laboratory Standard, references and resources, safety data sheets (SDS), personal protective equipment, fume hoods, chemical spill response, chemical waste disposal, flammable liquids and compressed gases.

Laboratory Supervisor Briefing reviews the responsibilities and University expectations of PIs and lab managers with supervisory responsibilities. This personal briefing includes an introduction to EHS training requirements for laboratory workers, emergency preparedness, procedures and postings, personal protective equipment, lab inspections, pollution prevention and waste disposal, University policies, power issues, minors in the lab, particularly hazardous substances and processes, and other topics of interest.

Other training specific to research type is available as needed including Biological Safety, Radiation Safety, Laser Safety, Animal Worker Health and Safety Training.

Search for health and safety training and enroll in classroom training sessions by visiting the University training website – **Employee Learning Center (www.princeton.edu/training)**.

Emergency Procedures

The Princeton Telephone and Email Notification System (PTENS) is an emergency notification system that allows authorized Princeton officials to send news and instructions simultaneously to individuals through landline phones, cellular phones, text messaging and e-mail. The benefits of the PTENS system are its immediacy and direct access to individual campus members through multiple points of contact.

Building Emergency Action Plan (EAP) – The Occupational Safety and Health Administration (OSHA) requires emergency action planning in all workplaces. The occupants of each building are responsible for the development and implementation of a written EAP covering the facilities and operations under their control.

The **Emergency Coordinator** is an integral part of each building's EAP. Emergency Coordinators are designated individuals within each department, office or program who are charged with helping to establish an EAP, helping to share the plan with building occupants and acting as a liaison with emergency responders and departmental personnel.

EHS provides **Laboratory Emergency Response Guidelines** postings for laboratory personnel to help prepare for and effectively respond to emergencies in the lab. The guideline provides information on the following: fire and medical emergencies, chemical spills and exposures, radiological contamination and exposure, biological safety.

Hazard Communication – EIPs, or Emergency Information Posters, are 8.5 x 11" postings designed to provide a convenient, easily recognizable and consistent means of displaying essential information about the status and contents of laboratories and facilities.

Research & Compliance Management ———

SHIELD (Safety Health Inspection and Equipment Logistics Database) is the new campus-wide health and safety management software. SHIELD consolidates health and safety information about lab groups, departments, buildings, rooms, and researchers into one concise, easy-to-use database.

<http://shield.princeton.edu>

SHIELD tracks training, equipment, and inspection records making them easily accessible for PIs, lab managers, and other designees to view, edit, and track. The PI and/or lab manager must ensure all members of the research group and their research “job activities” are entered into SHIELD.

Information on how to configure your lab data in SHIELD is available on the EHS website. EHS Lab Safety staff are also available to assist with managing the data entry and day-to-day use of the system.

Laboratory Safety: OSHA Standard ———

Officially titled “Occupational Exposure to Hazardous Chemicals in Laboratories,” the OSHA Lab Standard was developed to address health hazards unique to laboratories.

The OSHA Lab Standard requires that employers develop and carry out the provisions of a written Chemical Hygiene Plan (CHP) designed to protect employees from health hazards associated with hazardous chemicals in the laboratory and capable of keeping exposures below limits specified by OSHA. The standard is based, in part, on the book, “**Prudent Practices in the Laboratory**” prepared by a committee appointed by the National Research Council.

The OSHA lab standard is “performance based,” meaning the University is free to develop a customized program that protects the health of its laboratory workers as long as the minimum requirements of the standard are met.

At Princeton, **Chemical Hygiene Plans** (CHP) are specific to and maintained by each science and engineering department. Each department’s CHP is reviewed and updated annually; the latest version of your department CHP can be found on the EHS website (<http://ehs.princeton.edu>).

A **Chemical Hygiene Officer** (CHO) is designated in each department and is responsible for the implementation and maintenance of the CHP. The CHO and Department Safety Manager are responsible for the following:

- Review and update the CHP at least annually.
- Investigate accidents and chemical exposures within the department.
- Act as a liaison between the home department and the Environmental Health and Safety Office (EHS) for laboratory safety issues.
- Maintain records of training, exposure monitoring and medical examinations.
- Ensure laboratory workers receive chemical and procedure-specific training.
- Approve laboratory workers return to work following a chemical exposure that required medical consultation.
- Review and approve use of particularly hazardous substances.

Materials Requiring Special Approval ———

Some research applications require equipment or materials that require review and approval prior to beginning the work.

The PI must initiate the review process for the following specialized applications.

Particularly Hazardous Substances (PHS) are chemicals identified by OSHA requiring special review prior to use due to high acute toxicity, carcinogenicity or reproductive toxicity. A list of reagents specifically listed by OSHA is available on the EHS website.

Department of Homeland Security (DHS) Chemicals of Interest include a list of 300+ compounds identified as presenting an increased risk of use in acts of terrorism. The list of DHS chemicals is available from EHS.

Drug Enforcement Administration (DEA) Controlled Substances are drugs and certain other compounds whose purchase, use and disposal are strictly controlled. Controlled substances in New Jersey are regulated by the New Jersey Department of Consumer Affairs (NJ DCA) Drug Control Unit and the United States Department of Justice Drug Enforcement Administration (US DEA).

Environmental Health and Safety maintains the University's research license for controlled substances. It is the responsibility of EHS to ensure researchers working with these substances are aware of and understand their responsibility to comply with relevant state/federal statutes and regulations governing the use of these substances, whether for veterinary care or laboratory research applications.

Radioactive Material usage is authorized and approved by the University's Radiation Safety Committee. Radioisotope authorizations are issued for a term of five years; thereafter are renewed as needed. Amendments to radioisotope authorizations are required any time significant changes are made to the use of the material; e.g., changing locations of use, in-

crease/decrease possession limits, change in physical/chemical form, changes to experimental protocol.

Biological Materials - The use of certain biological materials in research and teaching activities must be registered with and approved by the Institutional Biological Safety Committee (IBC). Biological materials requiring approval include: recombinant and synthetic nucleic acid molecules as defined by the National Institutes of Health (NIH) Guidelines for Research Involving Recombinant and Synthetic Nucleic Acid Molecules; infectious and potentially infectious microorganisms and viruses, human and non-human primate materials, animal tissues that pose zoonotic disease risks and biological toxins.

Safety Equipment & Engineering Controls —

Research laboratories are filled with a variety of experimental equipment. It is important that the PI and research staff have a basic knowledge of such equipment. It is also important to understand how and by whom safety equipment and engineering controls are maintained and tested.

EHS and other facility support departments test and/or perform surveys of safety systems. You will be notified of problems/issues affecting building systems in your research areas.

The following are examples of safety equipment that may be found in your research building.

Fume Hoods – One of the primary safety devices in a laboratory is a chemical fume hood. A well-designed hood, when properly installed and maintained, can offer a substantial degree of protection to the user.

NOTE: Never modify, add or replace a fume hood without explicit approval by your department's facilities manager or Special Facilities supervisor and EHS.

Biological Safety Cabinets – Devices that filter potentially contaminated air through high-efficiency particulate (HEPA) filters and then back into the room and therefore are not appropriate for use when working with hazardous chemicals.

Other Laboratory Exhaust Systems – Laboratories use equipment and apparatus capable of generating airborne contaminants, but that cannot be confined within a fume hood. Other types of local exhaust ventilation systems including; canopy or slot hoods, downdraft tables, exhaust trunks toxic gas cabinets, may be required to control contaminants generated by these operations.

Safety Showers/Eyewash Stations – These safety systems are located throughout research buildings wherever hazardous reagents (e.g. corrosive, flammable, toxic) are used and where the potential for personnel exposure exists. Safety showers/eyewash stations are generally positioned within a research space or within a 10-second travel time (e.g. hallway).

Access to the safety shower/eyewash stations must be kept clear of obstructions to allow for quick access during an emergency.

Cleanrooms – Cleanrooms are used in practically every industry where small particles can adversely affect a manufacturing process. They vary in size and complexity, and are used on campus in semiconductor manufacturing and life sciences applications. There are cleanrooms operated by various departments in multiple research buildings across campus. EHS consults with cleanroom operators and occupants to ensure personnel safety is met while maintaining the integrity of the cleanroom environment.

Portable Fire Extinguishers – The University provides portable fire extinguishers for use under appropriate circumstances by

trained personnel. Wall mounted fire extinguishers are located throughout research buildings and are marked with conspicuous signage. The units are maintained by Facilities–Site Protection and routinely inspected by Facilities–Building Services. Training on extinguishing incipient fires is available through the Office of the University Fire Marshal (dpsfire@princeton.edu).

Building Fire Detection/Suppression – Smoke detectors and fire alarm and suppression systems are maintained in University buildings for your protection and for the safeguarding of our buildings. Facilities–Site Protection works with the Department of Public Safety–Fire Marshal to maintain and routinely test fire systems throughout the campus.

Emergency Shutoff – Some research buildings are equipped with emergency shutoff buttons that turn off power or natural gas service in a given laboratory area. Researchers may activate shutoffs in the event of a natural gas leak or other emergency event requiring isolation of electrical services.

Ventilation Purge Buttons – Some research buildings are equipped with emergency purge actuators that can be utilized in the event of a chemical spill or uncontrolled release of hazardous gas or vapor outside of a chemical fume hood. Researchers may push the purge button to activate a simultaneous increase in exhaust ventilation accompanied with reduction of supply to facilitate removal of the airborne contaminant.

Oxygen Level Monitors/Alarms – In certain enclosed areas (e.g., liquid helium processing area) where large volumes of cryogenic liquids are dispensed and/or stored, oxygen level monitors have been installed to monitor for oxygen-deficient environments. In most cases the alarms are local only and if activated should be reported to EHS for investigation. Outside of University work hours, contact the Department of Public Safety (DPS) at (609) 258-1000 for assistance.

Room Occupancy Sensors – Some research buildings have been equipped with occupancy sensors designed to sense when the room is occupied and to reduce room lighting and ventilation when unoccupied. Occupancy sensors are maintained by University Facilities–Grounds and Building Maintenance (GBM) personnel.

Chemical Spill Kits – EHS maintains general use chemical spill kits located throughout the campus research buildings. The kits consist of spill pads, waste bags, signs, instructions, loose absorbent and personal protective equipment. These kits are sufficient for most materials used in laboratory research. Specialized kits required for unique hazards; e.g., hydrofluoric acid, elemental mercury, concentrated acids/bases, are the responsibility of the individual research labs. EHS is available for consultation on choosing the appropriate spill control/neutralization materials.

Minus80 Monitoring – An environmental monitoring system used to remotely monitor critical parameters for any type of temperature controlled storage unit in your lab. The system provides researchers with real-time access to cloud-based data accessible via web portal, mobile phone or tablet. The system can deliver fully configurable alerts and alarms directly to lab staff via email, text, or voice. Contact EHS (ehs@princeton.edu) for more information.

Emergency Generator Power – In the event of power loss, laboratory buildings are equipped with emergency generators that provide power to some equipment, including emergency lighting, alarm systems, chemical fume hoods, environmental rooms, and other specially marked receptacles. EHS and GBM are available for consultation to ensure your emergency power and uninterruptable power supply (UPS) needs are met.

Laboratory Compliance Inspections ---

EHS conducts inspections of all campus laboratories at least annually. In addition, Department Safety Managers and safety committees are encouraged to conduct their own inspections at least annually. EHS compliance visits are scheduled in advance with the lab group and address a variety of compliance issues including, but not limited to, chemical storage, use of personal protective equipment, waste management, safety equipment maintenance and inspections, fire protection issues, and personnel training.

Findings and recommendations identified during compliance inspections are reported to the PI and host department. It is the responsibility of the PI and lab compliance lead(s) to ensure action is taken to correct any deficiencies.

Regulatory Agency Inspections are routinely conducted by local, state and federal regulatory agencies including the NJ Department of Environmental Protection (NJDEP), the US Environmental Protection Agency, Drug Enforcement Administration (DEA), the US Occupational Safety and Health Administration (OSHA) and local fire officials. The local fire official and the NJ Department of Environmental Protection conduct inspections regularly and are the most frequent visitors to campus.

Regulatory Fines/Citations ---

It is an objective of the Princeton University Policy on Environmental, Health and Safety to assure compliance with all applicable laws and regulations.

Per University policy, in the event that a violation is cited for an activity or condition in a laboratory, payment of fines assessed for the violation will be the responsibility of the laboratory's host department, which may pass along costs to the laboratory, as appropriate.

Hazardous Waste Management ---

EHS coordinates disposal of chemical waste from University operations. The cost of waste disposal is paid by EHS, rather than the individual department or laboratory. This is done in part to eliminate any hesitation to properly manage chemical wastes. It is imperative that supervisors ensure that all individuals involved in activities that generate waste are aware of and follow waste disposal policies and procedures.

Identify – Individuals generating waste must identify which wastes are, by regulation, hazardous wastes and follow the established management protocols.

Characterize – Hazardous wastes must be physically and chemically characterized to effectively communicate the constituents to the disposal facility.

Label – All chemical wastes must be labeled appropriately with the words “Hazardous Waste” from the moment the wastes are first generated.

Storage – Chemical wastes are to be stored in the areas where they are generated and kept closed/sealed at all times until the full waste containers are removed from the laboratory.

Notify – Contact EHS when you require wastes to be removed from the lab or with any questions or concerns involving chemical waste.

Drain Disposal ---

EHS health and safety policy prohibit disposal of any regulated hazardous chemicals via sanitary sewer (e.g., sink, floor drain). Additionally, the local sewerage treatment authority has stringent rules concerning drain disposal prohibiting the disposal of known toxic compounds, commercial solvents,

flammable liquids, solids or gases, certain corrosives, and certain metallic and cyanic compounds.

These restrictions, in addition to New Jersey Pollutant Discharge Elimination Rules, effectively preclude drain disposal of most wastes.

Shipping Regulated Materials

Shipping and transportation of hazardous materials are regulated domestically by the US Department of Transportation (DOT) and the International Civil Aviation Organization (ICAO) for international shipping.

EHS prepares and assists in all shipment or transportation of hazardous materials. Any chemical, biological or radiological material must be evaluated for applicability to domestic and international shipping rules.

Contact EHS with questions about shipping reagents or samples of any size/volume.

Minors in the Laboratory

In support of Princeton University's education and research mission, the University makes available a limited number of opportunities for high school students to participate in supervised educational research experiences with Princeton faculty.

NJ State Law requires that all high school laboratory research experience **must** be clearly identified as educational programs, not work, and **must** meet New Jersey Department of Labor standards of an educational program in science.

Minors between the ages 16 and 18 **may not** be hired to work in laboratories as a University employee, through a temporary agency, or in any other manner outside of the University's Laboratory Learning Program.

For more information about the Laboratory Learning Program for high school students, contact the Office of the Dean for Research.

Laboratory Security

Safeguarding University resources from unauthorized access, misuse or removal is a duty of all faculty and staff. In laboratories, this obligation rests primarily with the Principal Investigator; however, all laboratory personnel have a responsibility to take reasonable precautions against theft or misuse of materials, particularly those that could threaten the public.

University security policy requires security measures in the lab to be commensurate with the potential risks present; e.g., securing materials with the potential to be used for nefarious purposes; toxic and radioactive materials, controlled substances, DHS materials of concern.

Research or other activities involving the use of lab space, materials or equipment without the knowledge and approval of the responsible Principal Investigator is strictly prohibited. Violation of this prohibition may result in disciplinary action up to and including termination.

Laboratory Moves and Closeout

Upon completion of academic and research activities, and prior to leaving the University, all PIs and research staff must ensure they properly close out their research spaces. Care must be observed to ensure the following:

- Appropriately dispose of all chemical, radioactive and biological waste
- Alert PI or lab manager to any lingering issues; e.g., chemical unknowns, damaged/non-functioning equipment, etc.

- Clean all laboratory work surfaces with soap and water; e.g., benchtop, fume hood work surfaces, sink basin, and experimental apparatus/equipment.

Notify EHS several business days prior to leaving the institution to allow for a survey of your research space.

EHS will assist with regulated shipping of any samples, reagents, etc. for researchers and research groups moving their labs to other institutions outside of Princeton.

Surplus Property - All unwanted computers and certain other electronic equipment purchased by Princeton University must be managed through the University Resource Recovery Program. The program is managed by designated Surplus Coordinators within each department, working directly with Facilities–Building Services. Building Services collect items identified for surplus, warehouse items for reuse within the University, and properly dispose of broken, outdated and unusable items in a lawful, environmentally sound manner.

Contact your department office to learn more about surplus property and to find out your department's Surplus Manager.

University Resources and Contacts

Environmental Health and Safety

Main – (609) 258-5294
email – ehs@princeton.edu
Web – <http://ehs.princeton.edu>
SHIELD – <http://shield.princeton.edu>

Department of Public Safety (DPS)

Emergency – 911* or (609) 258-3333
Non-Emergency – (608) 258-1000
Web – <http://publicsafety.princeton.edu>

Emergency Management

Co-led by EHS and DPS
Web – <http://emergency.princeton.edu>

Research Integrity & Assurance

Web – <http://www.princeton.edu/ria>

Risk Management

Web – <http://finance.princeton.edu/how-to/insurance-risk-management>

University Health Services

Web – <http://uhs.princeton.edu>

Office of Research and Project Administration – ORPA

Web – <http://www.princeton.edu/orpa>

Office of the Dean for Research

Web – <http://research.princeton.edu/dean/>

Grounds and Building Maintenance

Work Order System – (609) 258-8000

Web – <http://facilities.princeton.edu/services>

Building Services

Request Services - (609) 258-8000

Web – [http://facilities.princeton.edu/services/
cleaning-and-recycling](http://facilities.princeton.edu/services/cleaning-and-recycling)

PRINCETON UNIVERSITY

EHS



**ENVIRONMENTAL
HEALTH ▲ SAFETY**

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