

VANDERBILT UNIVERSITY GENERAL STATEMENT OF ENVIRONMENTAL HEALTH AND SAFETY COMPLIANCE

Vanderbilt University recognizes and accepts its responsibility to provide a safe and healthful workplace for faculty, staff and students and conduct its operations in an environmentally sound manner complying with applicable environmental laws and regulations. Safety and environmental compliance are not the exclusive responsibilities of any one individual, department or office. Recognizing this, Vanderbilt University has created the Vanderbilt Environmental Health and Safety (VEHS) department to advise and assist the University's administration, faculty and staff in meeting their safety and environmental responsibilities. Each school, department and/or administrative unit is responsible for assuring direct compliance with applicable environmental health and safety regulations.

The men and women of Vanderbilt Environmental Health and Safety (VEHS) are a group of dedicated professional and technical personnel committed to assisting Vanderbilt achieve its core teaching, patient care and basic science research missions. Our role is to provide direct customer support, impact analysis and required oversight of the over 30 federal, state and local environmental health and safety regulatory requirements and guidelines that impact University operations and to develop and provide comprehensive and responsive programs to reduce risk and promote a safe and healthful campus community. We accomplish this task by providing expertise in the following technical environmental health and safety disciplines: Radiation Safety, Occupational Safety and Training, Environmental and Hazardous Waste Management, and Biological Safety. Below is a brief description of each section:

RADIATION SAFETY

Vanderbilt University holds a broad-scope radioactive materials license from the State of Tennessee, Department of Radiological Health (DRH). Additionally, we are responsible for providing compliance assistance with the Nuclear Regulatory Commission (NRC) Part 35 "Medical Use of By-product Material". A team of three (3) professional and four (4) technical staff provide consultation and service necessary to support the radiation safety needs of more than 270 authorized users of radiation in over 570 laboratories, in the School of Medicine and to Radiation Oncology, Radiology and Nuclear Medicine in the hospital. We also provide services to the Free Electron Laser institute and other campus entities. We serve as the executive arm of the Vanderbilt Radiation Safety Committee, in administering registrations and assuring compliance with the conditions of our license to use radioactivity safely.

OCCUPATIONAL SAFETY AND TRAINING

Five (5) professional staff of the Occupational Safety and Training section provides support services to assist University and Medical Center schools and departments with code and regulation compliance for Joint Commission for Accreditation of Hospital Organizations (JCAHO), Occupational Safety and Health Administration (OSHA)/Tennessee Occupational Safety and Health Administration (TOSHA) and National Fire Protection Association (NFPA)/Metro Fire Codes. Subject matter expertise is provided in the areas of: Fire Protection and Life Safety, Occupational and Construction Safety, Laboratory Safety, Industrial Hygiene, Emergency Preparedness, and various safety training topics. We also serve as University liaison with Metro Fire Department officials, TOSHA officers and insurance inspectors.

ENVIRONMENTAL AND HAZARDOUS WASTE MANAGEMENT

The Environmental and Hazardous Waste Management section is responsible for development and oversight of programs to ensure compliance with Environmental Protection Agency (EPA)/Tennessee Department of Environment and Conservation (TDEC) and Department of Transportation (DOT)/Tennessee Department of Transportation (TDOT) regulations. The four (4) professional and four (4) technical staff provide radioactive waste management, hazardous chemical waste management and environmental compliance services for all schools and departments of the Vanderbilt University community. Consultation and training regarding EPA/TDEC and DOT/TDOT requirements is also provided.

BIOLOGICAL SAFETY

The Biosafety Program is responsible for development and oversight of programs to ensure the safe handling, transport, use, and disposal of biological materials in laboratory or clinical research. This is accomplished primarily through research protocol review and facility audits. The Institutional Biosafety Committee (IBC), as required by the National Institute of Health (NIH), provides oversight of the Biosafety Program, as well as review and approval of research protocols using biological materials. Our two (2) professional Biosafety staff members also coordinate fit-testing of respirators to prevent exposure to tuberculosis for hospital personnel. Consultation and training regarding occupational exposure to potentially infectious materials and emergency response to incidents involving biological materials is also provided.

IMPROVEMENTS AND FUTURE CHALLENGES

Over the last two years, we have made major improvements in many of our environmental health and safety compliance programs. We have completely reorganized our customer service delivery methods, hired additional qualified staff, increased our funding and have completed a \$1.2 million renovation of our hazardous waste management facilities and administrative office space. We are beginning efforts to reconstitute required University-wide safety committees and school/unit specific safety committees. Our vision is to utilize these committees to assist Vanderbilt schools and departments to facilitate both safety and institutional compliance, in the most manageable and cost-effective manner possible.

Many future challenges abound for VEHS. Some major issues include: increased regulatory demands from the Environmental Protection Agency (EPA) for all university operations; human gene therapy clinical trials and increased regulatory scrutiny of research activities; new high-dose level radiation treatments and out-patient release for radiation therapies; support for major campus-wide construction activities and management for the accompanying growth.

ABOUT THE DIRECTOR

Robert F. Wheaton, MPH, CIH, joined Vanderbilt University in May 1998. During this time, he has reorganized the Vanderbilt Environmental Health and Safety function to become a customer-focused service organization that delivers quality environmental health and safety compliance programs to the Vanderbilt University community.

Wheaton has more than 20 years experience and has held various environmental health and safety management positions at Digital Equipment Corporation, Liberty Mutual and Harvard University. While at Harvard, he served as assistant director of environmental health and safety, where he directed and managed the industrial hygiene, biosafety and environmental programs.

He holds a master's of public health (MPH) degree in environmental health from Boston University, a bachelor of science in environmental chemistry from the University of Massachusetts-Amherst and is a board certified industrial hygienist (CIH).

Prepared by: Robert Wheaton

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