Graduating from an Incubator Space?

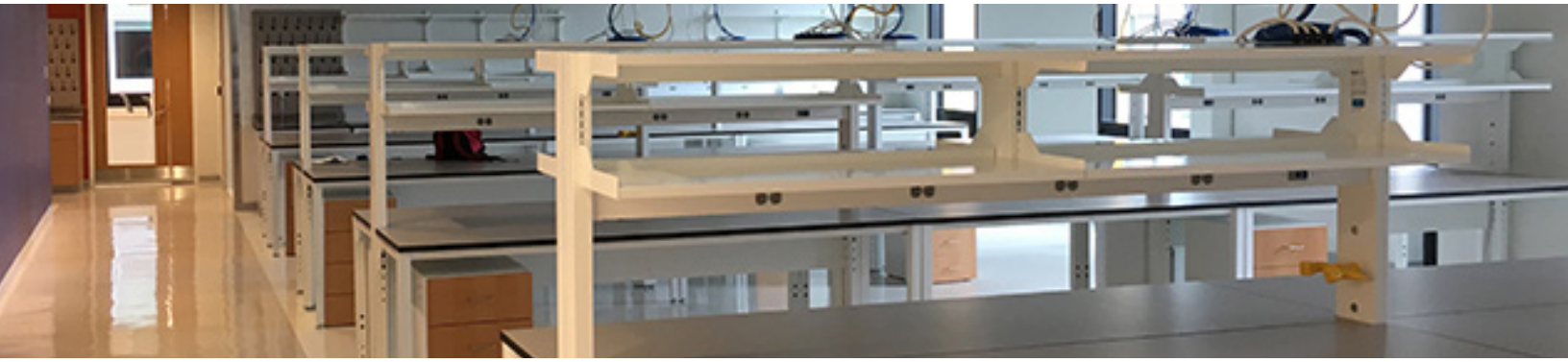
8 EH&S Topics You Should Consider

TRIUMVIRATE
ENVIRONMENTAL

It happened! You received funding and are now able to move to a new space. Congratulations! This is an exciting time full of opportunities. You can forge your own path and make history with your research and products.

However, when moving out of the supportive environment of an incubator, you will now be responsible for many different variables. All laboratory-based companies are subject to specific local, state, and federal regulatory requirements based on their location and their facility-specific operations. Are your chemicals safely packed? Plans and programs written? Permits secured? These are some of the questions you need to answer before making your move and starting operations!

Transitioning out of an incubator and into a new facility involves a whirlwind of activities that need to be coordinated. Here are the top eight Environmental, Health, and Safety (EH&S) areas to focus on as you move on and up.



1 Lease Obligations

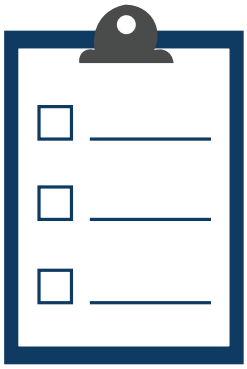
Knowing your lease responsibilities is an important first step in finding a new laboratory space. Before signing, make sure you understand the nuances of this contract and know what questions to ask. For example:

- What is the flammable load of the floor?
- Am I responsible for my own permits?
- Do I need to take care of the wastewater coming out of my space?
- What does my rent really cover?

Make sure you get your questions answered so you can be prepared to operate on day one. Maintaining clear communication channels with the property management company overseeing your new space will ensure a smooth transition and ongoing relationship.

2 Permits & Licenses

Depending on your company's work and the municipality to which you're relocating, you will need various permits and licenses before moving in and before beginning to operate. For example, you'll have to work with the local fire department, publicly owned treatment works, and department of public health to complete specific permits to ensure the lab is compliant for occupancy and use.



Some of the permits and licenses include:

- Flammable Storage Permit
- Source Registration
- DEA Controlled Substances Permit
- Hazardous Waste Activity Generator Notification
- Radioactive Materials License
- Ionizing Radiation Source Registration
- Wastewater Discharge Permit
- Laboratory Animal Use Permits
- rDNA Permits
- Select Agents & Toxins Licenses
- Regulated Medical Waste Generator Registration and Reporting
- Air Pollution Control Management and Permits
- Storm Water Permits
- Community Right-to-Know (Hazardous Material Reporting)
- Universal Waste Management
- Battery Handling and Disposal

Remember, the permits you need are based on your location and type of work you're performing.

3 Safety Programs

Safety-related plans, procedures, and programs are needed as you move into a new space to keep your employees safe and your operations compliant. The Occupational Safety and Health Administration (OSHA) governs most of the safety regulations in the workplace; understanding all the intricacies can be tough. For example, OSHA requires these written programs (among others):

- Bloodborne Pathogens & Biosafety
- Control of Hazardous Energy (Lockout Tagout)
- Emergency Action Planning
- Emergency Planning and Community Right-to-Know Act (EPCRA)
- Fire Department & Flammable Liquids/Hazardous Materials Permitting
- Hazard Communication
- Occupational Exposure to Hazardous Chemicals in Laboratories Standard
- OSHA Recordkeeping
- Personal Protective Equipment
- Respiratory Protection
- Spill Prevention, Control, and Countermeasures Plan (SPCC)

Many of these plans and programs take research, energy, and time to produce. Some of these regulations are locally specific per the town you move into, so be cautious to make sure you follow the correct regulations. Remember to start the process early and dedicate time for development!

4 Specialized Transport

Transporting your chemicals and biologicals is difficult and poses unique risks – and is very different from moving your equipment. Do you know which chemicals can be safely packed together? Do you have the proper containers to transport hazardous materials? Make sure you have a qualified, certified chemical moving company to pack and move your hazardous materials. Be cautious and ask a lot of questions to ensure you have the right company doing the right work so there are no minor mishaps or major accidents.

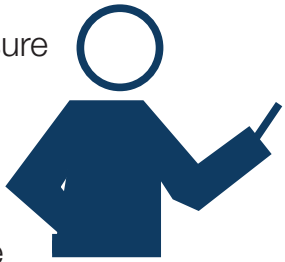
(Remember – DON'T MOVE CHEMICALS IN YOUR CAR!)

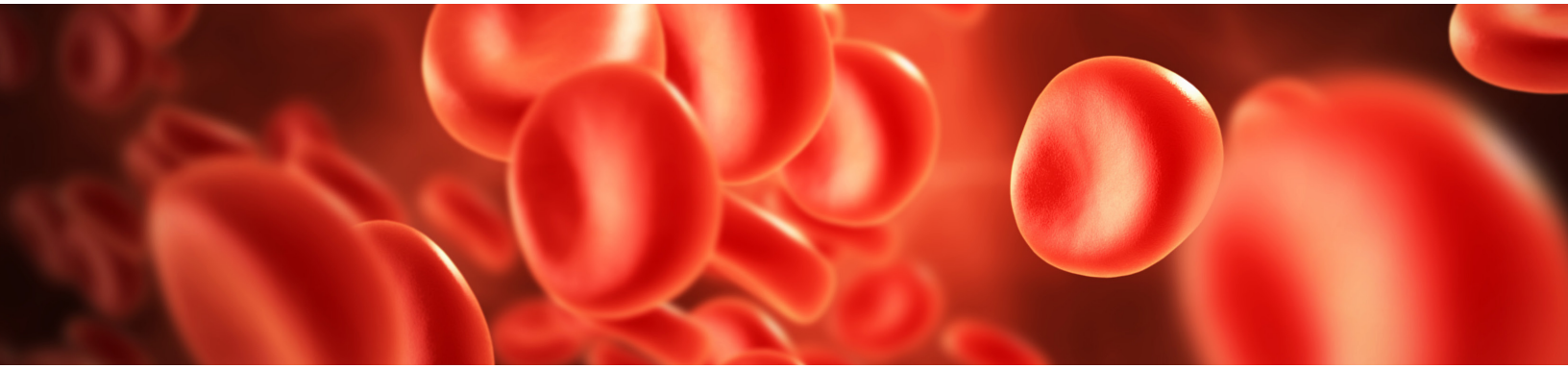
5 Air & Water Components

Ever stop to consider what is going up your fume hood or down your drain? These components are all controlled by local, state, and federal agencies. The Environmental Protection Agency (EPA) is the federal mastermind behind all state and local guidelines; understanding these interpretations will be key for success. Consider the work you are doing and what will be disposed of through drains or hoods to find out what is permissible. There are many more additional state and local permitting requirements needed to complete prior to starting work. Make sure the local publicly owned treatment works is on the list to call.

6 Training

Now out on your own, you will need to provide all the training required for your staff. Think about the numerous regulations that will need to be explained to your employees. For example, they will need to understand aspects of the Occupational Exposure to Hazardous Chemicals in Laboratories; Emergency Planning; Resource Conservation and Recovery Act (RCRA); Respiratory Protection; and other regulations. Training mandated by federal agencies cannot be delayed or ignored. Plans and programs need to be developed to meet the needs of your specific processes and trained to accordingly. These are vital to meet the federal demands of OSHA, EPA, and others. There can be a complicated web of tracking for which you're now responsible. You can utilize computer software to help; however, you are ultimately responsible for the updates and training programs of each program.





7 Biologicals

Including bloodborne pathogens from human or animal cell lines, biologicals have a separate list of rules and regulations to be followed to get set up and running compliantly. These rules are aimed to keep you, your employees, and the public safe. The National Institutes of Health (NIH) and the Centers for Disease Control and Prevention (CDC) are specific on how to set up, receive, manage, and dispose of biologicals at your site. Some towns and cities have even more specific approval meetings for you to attend before you start work. Make sure you understand what the municipality, in the state and town, will require you to complete before moving so you are ready for a compliant work space to avoid a costly failed inspection.

8 Emergency Response

We always hope nothing goes wrong, but if it does, you need to be prepared to act. A chemical or biological spill or gas release is dangerous, and an emergency response situation can be stressful. You need to have plans and programs in place to respond effectively and safely. To develop a plan ahead of an emergency, think about the people first and how to keep everyone safe. Then it is the knowledge of the equipment your team will be using, biologicals with which they'll be working, and chemicals they will be mixing. And consider the public area with other tenants in the building or people outside your building.

The aftermath of an emergency response, when everyone is safe, is sometimes just as complex. If a hazardous waste or chemical spill occurs, do you know what reporting is required? Do you know what agency to call? Do you have an agency calling you? There is a lot to cover but being prepared and having a team of experts next to you will be key for any emergency.

Work Hand-in-Hand with a Partner

The transition from an incubator space can be overwhelming, but it doesn't have to be! As you continue to grow, choose a partner that knows the nuances of the EH&S space and the unique challenges faced by life science organizations. Eliminate your worries by working with a company that wants to succeed with you each step of the way.

Triumvirate Environmental is a multi-service EH&S firm offering comprehensive solutions that serve the full range of our clients' regulatory compliance and operational needs. The depth and breadth of our professional services provide a "one-stop shop" with an array of services unparalleled in the industry. By partnering with Triumvirate Environmental, you will have:

- A dedicated technical service team
- A focus on minimizing risk and liability
- Access to well-trained staff who emphasize program compliance & employee engagement
- Experts skilled in hazardous waste minimization, reduction, and recycling
- Monthly executive status and summary reports to deliver transparency
- A commitment to provide continued guidance and assistance with regulations and compliance

We are experts in all facets of EH&S regulatory and compliance requirements established by federal and state agencies, such as the EPA, OSHA, DOT, IATA, and FDA. You and your team can focus on your innovative work while we handle your compliance and operational needs to support innovation, growth, and success.

Good Luck with Your Next Chapter!

Congratulations again on your graduation from the incubator. As you embark on this new adventure, you'll have more opportunity to build your company but more regulatory requirements to follow. You don't need to go about it alone – the experts at Triumvirate Environmental are available to assist you every step of the way. Click the button below or visit **www.triumvirate.com/incubator-consultation** to contact us to discuss your EH&S needs.

CONTACT OUR EXPERTS