Safety and Risk Assessment:

The NIH Policy Manual 3015 Admittance of Minors to Hazardous Areas and 2300-320-7 Intramural Research Training Award (IRTA) Program define the criteria for students working in NIH facilities. The EHS safety program performs focused risk assessments to evaluate chemical, biological, radiological, and other hazards that may be present in areas where minor students work. To evaluate the need for this risk assessment, mentors will complete an EHS Risk Assessment for Minor Student Programs as part of their mentor registration process.

Radiation:

Minor student intending to use radiation must receive approval from the NCI at Frederick Radiation Safety Officer.

Biological:

Minor students are prohibited from working with human and/or nonhuman primate blood, body fluids, primary cell cultures and tissue. Students working with biological research material must complete OSHA Bloodborne Pathogen Training, initially and annually thereafter. In addition, students must be trained by their mentor on any applicable IBC registrations, biological safety practices, and procedures for risk mitigation.

Chemical:

Chemicals that students may not use and must be isolated from:

1. GHS category 1 and 2 acutely toxic chemicals, H-Codes: H300, H304, H305, H310, H330
2. GHS category 1A reproductive toxicity, H-Codes: H360, H360F, H360D, H360FD, H360Fd, H360Df
3. National Toxicology Program listed known carcinogens
   a. https://ntp.niehs.nih.gov/whatwestudy/assessments/cancer/roc
   b. Scroll down to “substances listed” link
   c. Known to be human carcinogens only

When these chemical are present in a laboratory space that laboratory space requires a Safety Mitigation Plan for Minor Employees, chemicals must be isolated where the student may not access the chemicals, meaning the chemical must be in an enclosed container (cabinet, fridge, box with lid, etc.) and clearly labeled “not for student use.” Areas where these chemicals were used must be decontaminated after the chemicals have been isolated. Please make students aware that they may not open the containers and remind fellow lab staff that the chemicals cannot be used while student are present.

Chemicals students may not use that do not require isolation from:

1. GHS any category acutely toxic chemicals, H-Codes: H301, H302, H303, H311, H312, H313, H331, H332, H333

2. GHS any category of reproductive toxicity, H-Codes: H360, H360F, H360D, H360FD, H360Fd, H360Df, H361, H361f, H361d, H361fd, H362

3. GHS any category of carcinogenicity, H-Codes: H350, H350i, H351
   a. National Toxicology Program, Reasonably Anticipated To Be Human Carcinogens