



ROLE OF SAFETY PROFESSIONAL DURING MAJOR SITE RELOCATION

Presented by

Deepa Kundadka, CIH , Email: deepa@dkksafety.com

February 3, 2021

23Rd Annual California CUPA Training Conference
February 2 thru March 18, 2021
Virtual Conference



www.calcupa.org

Contents

- Introduction: Consolidation of sites to One Single Location
- What's next: Formation of Move Workstream Committee
- SHE Permits and Licenses
- Path to successful relocation
- Navigating site personnel during the move
- Material/Chemical Transfer and Decontamination
- Hazmat Closure of the site



Introduction: Consolidation of sites to a Single Location

- Consolidation of sites which includes past and present acquisitions into one location
- New state-of-the-art location is in the heart of South San Francisco's biotech community



23rd Annual California CUPA Training Conference
February-March 2021

What's next: Formation of Move Workstream Committee



I get a call from Management in the beginning of Q1 : An opportunity to take the lead on SHE workstream



Subsequently the following team meets every other week:

- SHE
- Soft Service and Move Management
- Lab Operations
- Maintenance/Metrology
- SAP/Asset Management
- Project Engineering/Decommissioning

23rd Annual California CUPA Training Conference
February-March 2021

Tip: Ask for help from Legal Department

- A formal Letter describing the consolidation of site to a single location: to be provided by Legal
- This will serve as a cover letter which one can then customize while writing to different agencies
 - DTSC
 - Local County/ CUPA
 - Air Quality Management District
 - City
 - USDA



SHE Regulatory Workstream: Permits, Construction Progress

Permits	Work Involved
Medical Waste EPA ID Hazardous Material and Waste Storage Permit	-Gathering information about: <ul style="list-style-type: none">• Different entities• Laboratory activities/processes• Hazardous material inventory• Medical waste information• Hazardous Waste streams
Industrial Wastewater Discharge Permit	- Turning in application - Liaison between company and regulatory agency - Receiving the Permit



SHE Regulatory Workstream: Permits, Construction –Cont'd

Permits	Work Involved
Air Permit	Collecting information on processes and potential emissions
USDA Permit	Information on laboratory activities that involves biological agents

USDA Permits

USDA Permits for biological agents used in Research & Development:

- List all the biological agents used in the research lab by different entities
- Apply for transfer/amendment of the permit and legal entity transfer



USDA Permits



Obtained the biosafety questionnaire from USDA as a first step



Worked with lab ambassadors to complete biosafety questionnaire



After the completion, applied for amend/transfer via the USDA ePermits site

USDA Permits

Cont'd

- After the application is approved
- Schedule inspection with USDA inspector for lab inspection
 - During Inspection:
 - Inspector ensures lab is set up with biosafety signs
 - Reviews Biosafety and Biosecurity Plan
 - Lab has keycard-controlled access
 - Secondary containment carrier is available to transfer biological agents from freezers to lab benches



Scope of Work for Air Permit

- Air permit will cover lab activities and major laboratory equipment:
 - Pharmaceutical Spray Dryer
 - Vapor Emission Control System - Cryogenic Condensation
 - Solvent Wipe Cleaning

 - Application was submitted to Bay Area Air Quality Management District (BAAQMD)
 - We received exemption for spray dryer and cryogenic abatement system
 - as the lab floor space within the building was less than 25,000 sq ft
 - and total number of fume hoods within the building is less than 50



Medical Waste Inspection and Fire Inspection

- After relocation and initial lab set up has been completed, follow up with CUPA for
 - Medical Waste Inspection with the County
 - Fire Inspection with the City



Global Engineering and Safety Interaction

- Worked very closely with Global Engineering, Construction Company - was involved in the building design review
- An opportunity to work with Architects, Construction and Global engineering on project details/updates
 - Got familiar with Building Information Modeling (BIM) model – a 3D design review tool to view building utility details
 - Construction company further improved BIM model by adding virtual reality to identify utility connections



ence
2021

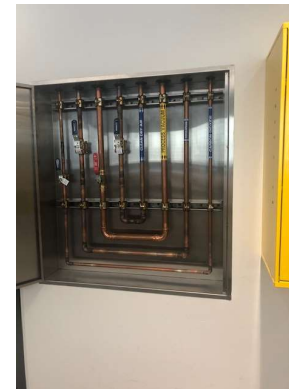
Construction Phase



- Be flexible to shuttle between construction site and current site
- Be vigilant on the progress made
- Stay in touch with stakeholders such as Construction Company, Architects, Global Engineering Project Manager and Lab Ambassadors'

Global Engineering and Safety Interaction

- Design Review- SHE Risk Assessment was conducted with Global Engineering:
- Helped to catch design flaws upfront for SSF building:
- Example: Freight elevator Compliance issue fixed
 - Bringing panel of valves (CO₂,CDA,N₂, Vacuum) easier to access in the lab during PMs or repairs
 - Ceiling Utilities were designed with clearance below to be easily accessed via manlift resulting in a ladder free site.



23rd Annual California CUPA Training Conference
February-March 2021

SHE Workstream

Accomplishments

- Major SHE Permits Received by Q4:
 - CUPA Permit for Hazmat Storage and Hazardous Waste
 - EPA ID
 - Medical Waste Permit Application completed and approved
 - Facility ID received for client site



Miscellaneous permits: Business License Application(BLA)

- Be flexible to work on permits outside of SHE Scope
- Had to file 3 different applications of:
 - Parent Company
 - Acquisition 1
 - Acquisition 2



Bringing in Key SHE Vendors onboard

Hazardous Waste Management Company

Prescription Safety Glass

Occupational Health Clinic





BREAK TIME!



Hazmat Closure of the Site

Decontamination/Decommissioning



Assisting Scientists with the site relocation

- Lab purges, coordinating hazardous waste consolidation and disposal
 - Lab purges of unwanted reagents/consumables
 - -80-degree freezer clean up



23rd Annual California COPA Training Conference
February-March 2021

Assisting Scientists with Equipment Move

- Lab equipment decontamination training
- Material Transfer request for transferring chemicals, reagents among others
 - Connect scientists with companies that help move lab equipment, freezers, chemicals
 - Facilitate the process



23rd Annual California CUPA Training Conference
February-March 2021

Hazardous Material Closure

- Worked with CUPA to comply with Hazmat Closure requirement
- Reviewed and submitted hazmat closure application and plan
- Performed walkthrough with City and obtained approval on commencing the decontamination/decommissioning
- Worked with third party vendor on decontamination work



Decommissioning and Hazardous Material Closure

➤ Challenges:

- Lots of consumables were left behind by the lab scientists. Decon vendors typically prefer the labs to be empty while performing the decon
- A lot of equipment were being left behind and as a part of real estate deal the landlord and new tenants had a mutual agreement



Decommissioning and Hazardous Material Closure ...Cont'd

- CUPA directed us to get a letter from landlord that they were in agreement with the company leaving behind the equipment



Decommissioning and Hazardous Material Closure .. Cont'd

Final Closure walkthrough:

- City approves the decon work
- When all the hazardous waste manifests were received by the City
- They forward the closure letter in October



Conclusion

- Good exposure to working with
 - Global Engineering
 - Construction company
 - Architects
 - Regulatory agencies such as DTSC, BAAQMD
 - Local CUPA/ City and County Regulatory Officials

Conclusion

...Cont'd

- Learned a lot about assisting a company during major relocation
 - Including assisting scientists with the relocation
 - Interfacing with regulatory agencies in a changing environment
 - Networking with diverse group of teams
- Handled my first decommissioning project
- Successful relocation means safe site and sustained growth



23rd Annual California CUPA Training Conference
February-March 2021

Any Questions???

Deepa Kundadka, CIH
DKK Safety and Environmental
EMAIL: deepa@dkksafety.com
Website: www.dkksafety.com



23rd Annual California CUPA Training Conference
February-March 2021