

Clothing Exemptions – Guiding Principles



Overview

A combination of clothing and shoes that fully cover the legs and feet is required when working in spaces that have hazardous chemicals, which includes almost all lab spaces. Similarly, there are requirements to have the legs covered in spaces with other hazards that could pose a risk to individuals, such as physical hazards or biological and radioactive materials that pose an exposure risk. Individuals briefly visiting a space are exempt from this requirement if they are not near hazardous materials.

DLCs may give exemptions for low-risk rooms or areas within rooms where less stringent clothing requirements may be acceptable based on a hazard assessment. DLC EHS Committees are responsible for determining the process for exemption request review and approval in their DLCs.

Exemption Process Considerations

The following are some things to consider when developing DLC exemption protocols. Information on DLC-specific procedures should either be included in the CHP or documented and shared with DLC personnel through alternate channels.

- Determine the process for submitting an exemption request, such as whether the PI/Supervisor should send an email to a specific person/list, fill out a form, *etc.*
- DLC EHS Committees are responsible for determining who will review and approve exemption requests. This could be the DLC EHS Coordinator, DLC EHS Committee Members, and/or the EHS Team assigned to the DLC.
- The DLC EHS Committees may set guidelines for assessing space hazards to be used by the DLC exemption reviewer(s). Exemptions should not be given if any of the following are true.
 - The space has hazardous chemicals that could cause either immediate or long-term injury in the event of skin exposure.
 - The space has biological materials that could cause infection or illness upon exposure to either intact or damaged skin (ex. cuts, rashes).
 - The space has radioactive materials.
 - The space has physical hazards that could cause injury, including but not limited to:
 - Temperature-related hazards such as cryogen storage, autoclaves, furnaces, hot work (ex. welding, torch cutting).
 - Flying debris (ex. from machine shop tools).
 - Exposed electrical conductors.
- DLCs and the EHS Office are responsible for documenting exemptions. DLCs have flexibility to determine the system that works best for them. Typically, the EHS Coordinator will oversee documentation on the DLC side, but this role may be assigned to people in other positions. Some options for documentation include:

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- Notes in the “Comments” section for rooms with exemptions in PI Space Registration. This is strongly recommended as the PI Space notes can be viewed by designated lab personnel, EHS Coordinators, and EHS Office staff.
- Signage posted in areas where exemptions have been granted.
- Computer documents listing exemptions. If this approach is taken ensure they are shared in a way that can be easily viewed and passed on to future DLC personnel.