This is the written incident response plan for the University of Arizona. This plan addresses and meets the requirements of the Select Agent Regulations.
Certification and Approvals

This Incident Response Plan has been approved by:

James Spencer, MS, RBP,  
Responsible Official  
Biological Safety Officer

This Incident Response Plan for the University of Arizona has been prepared in compliance with the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 and 7 CFR Part 331, 9 CFR Part 121, and 42 CFR Part 73. This plan is required to be reviewed annually and updated whenever changes occur. The signature below verifies the annual review for this plan was completed.

Signature of Responsible Official

James Spencer, MS, RBP

26May2020

Date

Research Laboratory and Safety Services (RLSS)
1717 E. Speedway Blvd. (Bldg. 151)  
Suite 1201  
Tucson, AZ 85724  
P.O. Box 245101  
www.rlss.arizona.edu
Phone (520) 626-6850 Fax (520) 626-2583

For emergency assistance after hours,  
call University Police at 621-UAPD (621-8273)
Personnel Roles
The University of Arizona Responsible Official, in conjunction with Principal Investigators and their staff, will facilitate the development, implementation, and monitoring of the entity incident response plan in conjunction with the University of Arizona Emergency Management Coordinator.

Roles During Incident Response
The University of Arizona adheres to the National Incident Management Systems (NIMS) Incident Command System for defining personnel roles and lines of communication during an incident. The lead person during an incident will be the Incident Commander designated by the University of Arizona Critical Incident Response Team (CIRT). The Responsible Official or an Alternate Responsible Official (RO/ARO) will be designated as a deputy incident commander and available to the CIRT for advice. Laboratory personnel present during the incident will be required to remain on site for questions that may arise.

RLSS Emergency Responders
The following Security Risk Assessment (SRA) approved individuals will be enrolled in the UA Respiratory Protection Program (fit-tested/medically cleared) and available for emergency response:
- Responsible Official and Alternate Responsible Official.
- RLSS Biosafety staff.
The RLSS emergency response kit that includes PPE and respiratory protection is required to be brought to any potential emergency.

Coordination with Emergency Responders
The University of Arizona is committed to being compliant with the National Incident Management System (NIMS). By order of the President of the University of Arizona, August 15, 2005, NIMS has been established as the standard of operation for the University. Under NIMS, the Incident Commander (IC) is designated as having overall command and control during an incident. All planning and coordination with local emergency responders will be initiated and handled through the University of Arizona Police Department (UAPD). RLSS has staff on call 24/7 who will also be contacted by UAPD.

The University of Arizona Critical Incident Response Team (CIRT) is composed of various campus officials with a primary focus on the management of situations involving critical incidents on campus. In an emergency, the University’s highest priority in ensuring the health, safety and well-being of people on and off campus. After the University acts to protect the safety of individuals, University facilities, buildings and property are the next highest priority, followed by private property that may be affected by the situation. When needed, CIRT will coordinate University efforts with the Pima County Office of Emergency Management. CIRT will continue to monitor and coordinate events until the emergency situation is stabilized sufficiently to allow a return to regular organizational operation. At an appropriate time, CIRT debriefs with each of the units involved in an emergency in an ongoing effort to improve the University response to crisis situations.

Phoning 9-1-1 is the first step to summoning emergency responders whether on the main campus, or at an offsite facility. If an incident involves a biological hazard, RLSS and Risk Management Services (RMS) should also be contacted once emergency responders have been notified for the incident. If a select agent or toxin is in use when a threat occurs (e.g. inventory discrepancies, security breach (including IT), workplace violence, bomb threats, and suspicious packages) shut down the laboratory and ensure agents are properly stored and locked. Select agents and toxins not in use must be secured in their storage area at all times.
Site Security
The University of Arizona Biosecurity Plan is the reference document for site security. Procedures for theft, loss, or release of a select agent or toxin at the main campus, or at an offsite facility, can be found in the University of Arizona Biosecurity Plan.

List of PPE and Other Emergency Equipment
The following PPE is part of the RLSS incident response kit:
- Gloves
- Disinfectant (Bleach)
- Disposable gowns
- Shoe covers
- Biohazard bags
- Hair bonnets
- Protective eyewear
- Respirators and Powered Air Purifying Respirators (PAPR) (available respirators must be appropriate for the individual, and they must have completed their annual fit test)

The RLSS incident response kit is located in the Babcock Building, suite 1201, room 1212. RLSS staff responding to a biological emergency should retrieve this kit, and take it with them.

The following emergency equipment must be available for incident response in all laboratories:
- Biological spill kit
- First aid kit

**The biological spill kit and first aid kit for the registered Select Agent & Toxin spaces are located in Keating 402K1 and Arizona Health Sciences Center (AHSC) 1256. The PPE for the registered spaces is located in Keating 402K and AHSC 1256.**

First Aid
In case of serious injury or illness on campus, immediately call University Police at 9-1-1. If you are not located on the main University campus, still call 9-1-1 and report the injury or illness to the local emergency responders. Do not move a seriously injured person unless they are in further danger, or told to do so by emergency responders. Give your name, describe the nature of the problem, and the location of the victim. Dispatchers will relay information to the emergency response personnel.

Quickly perform these four steps:
- Determine welfare of victim by asking, "Are you okay," and "What is wrong?"
- If the victim is unconscious, check pulse and breathing, and give CPR or artificial respiration if necessary, and if you are able.
- Control serious bleeding by applying direct pressure, and elevating the wounded area.
- Keep victim still and comfortable; have them lie down if necessary.

For minor injuries or minor medical urgencies, employees should contact Risk Management Services, who will direct them where to seek medical attention. Employees may go to their private physician but they must let them know if the injury or illness is work-related. Supervisors must ensure that they or a co-worker accompany
the injured or ill person to the medical care facility. More information about the University of Arizona emergency procedures can be found at the Risk Management Services website.

The Thomas Keating Building (BIO5), 402 Suite anteroom contains disposable gloves, Tyvek gowns, shoe covers, respiratory protection, and eye protection if needed to respond to an emergency. A PAPR is available. A fire extinguisher is also available for use by trained staff during a non-life threatening fire.

Arizona Health Sciences Center (AHSC), 1256/A anteroom contains Tyvek gowns, hair bonnets, shoe covers, disposable gloves, respiratory protection, and eye protection if needed to respond to an emergency. A fire extinguisher is also available in the hallway for use by trained staff during a non-life threatening fire.

**Spills of Infectious Material**

**Spills Outside of the Biosafety Cabinet**
If a spill occurs outside of the biosafety cabinet, the laboratory worker must should follow these steps:

- Hold your breath, remove any contaminated PPE in the spill area, and clear the area of all personnel.
- Ensure that no one enters the area where the spill has occurred, and contact the RO/ARO to inform them of the spill and discuss the next steps (contact UAPD afterhours).
- Wait at least 30 minutes for potential aerosols to settle before entering the spill area.
- Ensure that any PPE that was removed after the spill is replaced before entering the spill area. Discuss with the RO/ARO if respiratory protection will be required for spill clean-up.
- Initiate cleanup with freshly made 10% bleach solution as follows:
  - Place absorbent material on the spill.
  - Apply disinfectant in a circular pattern around the spill starting from the outside moving inward, until the entire spill area has been covered by disinfectant.
  - Allow a minimum of 15 minutes contact time to ensure complete disinfection. Note that the RO/ARO may require a longer contact time for certain agents.
  - Equipment located near the spill area that may have been splashed should be wiped down with 10% bleach.
  - Carefully discard of the absorbent material in a biohazardous waster container, and wipe up any leftover disinfectant from the floor.

**Spills Outside of the Laboratory**
If a spill occurs outside of the laboratory, the worker must should follow these steps:

- Hold your breath, remove any contaminated clothing, clear the area of all personnel, and remain near the area until assistance arrives.
- Ensure that no one enters the area where the spill has occurred, and contact the RO/ARO to inform them of the spill (contact UAPD afterhours). The RO/ARO will meet you at the location of the spill, and bring the proper PPE, disinfectant, clean-up items, and respiratory protection needed.
- Wait at least 30 minutes for potential aerosols to settle before entering the spill area. If the spill is indoors, the RO/ARO may need to notify the building manager to shut down the air handling system.
- Ensure that proper PPE is donned before entering the spill area. Discuss with the RO/ARO if respiratory protection will be required for spill clean-up.
- Initiate cleanup with freshly made 10% bleach solution as follows:
o Place absorbent material on the spill.

o Apply disinfectant in a circular pattern around the spill starting from the outside moving inward, until the entire spill area has been covered by disinfectant.

o Allow a minimum of 15 minutes contact time to ensure complete disinfection. Note that the RO/ARO may require a longer contact time for certain agents.

o Items located near the spill area that may have been splashed should be wiped down with 10% bleach.

o Carefully discard of the absorbent material into double bagged biohazardous waster bags, and dispose of in autoclave or biohazardous waste accumulation site.

o Wipe up any leftover disinfectant from the floor.

**Biological Safety Cabinet (BSC) Failure**

When preparing to work inside of a BSC, if you notice that it is not functioning as designed (refer to the Biosafety Manual), do not use it, and contact the Facilities Management department to have them look into the issue. Do not use the BSC until it has been fixed and recertified. If the BSC stops functioning while it is in use, stop working immediately, remove your outer gloves if you have any on, and shut the sash to the cabinet. Contact RLSS to report the incident, and they can direct you in the correct steps to remove your items from the cabinet before contacting Facilities Management. Do not use the BSC until it has been fixed and recertified.

**Laboratory Ventilation Failure**

**Biological Safety Level 3 Laboratory – Keating Building**

In the event that the negative pressure going into the laboratory goes out of range from the set limits, an audible local exhaust alarm will sound. This alarm is a notification that staff inside the laboratory should immediately stop what they are doing, secure the biological agents they are working with, and exit the laboratory per normal protocol. Once outside the laboratory, the Building Manager and/or the Facilities Management Building Automation Systems (BAS) department should be contact to report the alarm. Staff should also take notice of the pressure readings on the external wall of the laboratory, and report the readings. The Building Manager and/or BAS department will contact RLSS to report the ongoing issue. Staff should not reenter the laboratory until they are given the all clear from the Building Manager and BAS department. Once the all clear has been given, staff may reenter the laboratory and return to their normal duties. Please refer to Appendix B of the manual for step-by-step instructions.

**Evacuation**

The quickest way to evacuate people from any of the select agent and toxin laboratories at the University of Arizona during an incident is to pull the nearest fire alarm. This can be performed for incidents that involve:

- Intruder into the space
- Assault
- Flooding
- Smoke or fire
- Gas leaks

After the building has been evacuated, the individual that pulled the alarm can inform UAPD of the situation surrounding the need to pull the alarm.
The University of Arizona utilizes a mass notification system (UAlert) that all SRA approved individuals are encouraged to sign up for. If any major incident occurs on campus, notifications are sent out by the UAPD to all individuals registered in the system. The notifications include the incident and appropriate response instructions.

Each individual laboratory should be posted with evacuation routes. The UAPD has an emergency point of contact for each building on campus. Each building also has predetermined rendezvous points in case of any type of evacuation. These rendezvous points are set at a predetermined safe distance from each building.

**Decontamination**
In the event of a spill, 10% bleach is recommended disinfectant to be used. All surface areas are to be wiped down and allowed to dry for a minimum of 15 minutes, unless otherwise specified by the RO/ARO.

If the spill requires a more intensive method (i.e. gaseous decontamination), Facilities Management should be contacted (520-621-3000) to set up a decontamination date and time.

**Drills and Exercises**
Drills and exercises that satisfy the requirements of the Biosafety, Biosecurity, and Incident Response Plans are conducted annually by RLSS. Documentation for all drills is maintained by RLSS. All written plans at the University are reviewed annually and updated when drills and exercises warrant change.

**Select Agent Reference Document**
The document entitled *Laboratory Security and Emergency Response Guidance for Laboratories Working with Select Agents* published in the Morbidity and Mortality Weekly Report (December 6, 2002; 51: RR-19:1-6), and the Biosafety in Microbiological and Biomedical Laboratories (BMBL) 5th edition are the University’s reference documents.

**Retention of Records**
The RO’s records are required to be retained for three (3) years, and include the following: inventory transfers, theft, loss, and/or release of agent, biosecurity, biosafety, incident response, and training related documents. Outdated and/or unneeded records shall be shredded.
Appendix A

Emergency Contact Information

University of Arizona Police Department (UAPD) – (520) 621-8273 or 9-1-1
Fire, general emergency - 9-1-1
All university phones will contact UAPD directly. If calling from a cell phone, give your identity and location, and you will be immediately connected with UAPD.

Research Laboratory and Safety Services – (520) 626-6850
Responsible Official: James Spencer, MS, RBP – Cell (443) 375-7393
Alternate Responsible Official: Ceasar Ramirez – Cell: (520) 309-8955

Risk Management Services – (520) 621-1790
Appendix B

Keating Building BSL-3 Ventilation Failure Response

In the event of a ventilation failure in the BSL-3 suite located in the Keating Building, a local alarm will sound to alert the workers. Once the exhaust alarm is sounded, staff inside the laboratory should follow these steps.

1. Immediately stop what you are doing.
2. Secure your work.
   a. If working in a BSC, ensure that the agents are secured that they will not fall over and spill.
   b. If working outside of a BSC, put any agents back into an incubator, fridge, freezer, etc.
3. Exit the laboratory per normal protocol, including removing PPE and washing hands, into the anteroom, then out into the common hallway.
   a. While exiting the laboratory, make sure others are aware of the need exit as well.
4. Once outside the laboratory, contact the Building Manager and inform them that the local audible room exhaust flow alarm is sounding, and relay to them the gauge readings on the laboratory exterior wall.
   a. If you are unable to reach the Building Manager, contact the Facilities Management Building Automation Systems (BAS) department and report the above listed information.
5. The Building Manager and/or BAS department will contact RLSS to report the ongoing issue.
6. Do not enter the laboratory until the laboratory has been cleared by the Building Manager and the BAS department.
7. Once the laboratory has been cleared, you may enter and resume work.

Keating Building Manager: Robert Sandoval - Office (520) 626-8512, Cell (520) 275-7603

Facilities Management – (520) 621-3000

BAS Department: Chris Watson – Office (520) 621-1399, Cell (520) 247-6104
   David Hopper – Office (520) 621-9009, Cell (520) 631-5587

Research Laboratory and Safety Services – (520) 626-6850

Responsible Official: James Spencer, MS, RBP – Office (520) 626-5004, Cell (443) 375-7393

Alternate Responsible Official: Ceasar Ramirez – Office (520) 626-6850, Cell: (520) 309-8955