Lab Closeout Policy

Description

OBJECTIVE

This policy addresses laboratory closures and the associated disposition of hazardous materials. The policy is intended to ensure laboratory spaces being closed, relocated, renovated, or vacated are left in a safe condition and that hazardous materials are handled and disposed of appropriately during the close out process.

POLICY

Notification to Environmental Health and Safety (EH&S) is required prior to closing, vacating, relocating, or renovating a laboratory by submitting the Lab Closeout Reporting form. A minimum thirty (30) day advance notice is requested.

Using the procedures and resources listed below, the laboratory must be made safe for future or planned renovations, repair, maintenance or occupants. The department will take full responsibility for any non-fixed equipment and supplies that are not removed from laboratories for closeout or relocation.

EH&S will conduct and document a laboratory closeout survey to document that all close-out activities have been completed appropriately.

RESPONSIBILITY

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- Notify EH&S prior to closing, vacating, relocating, or renovating a laboratory. A minimum thirty (30) days advance notice is requested.
- Ensure chemicals are handled safely in accordance with the UF General Chemical Hygiene Plan and the lab-specific Chemical Hygiene Plan.
- Ensure employees conducting the closeout are instructed on hazards, follow proper procedures, and utilize protective equipment provided during their work as detailed in written plans and SOPs.
- Close out or amend with the new UF location, any permits, licenses, or registrations (e.g. radiation or laser use authorizations, Biosafety/IBC registered biohazard projects, USDA or CDC permits, DEA licenses, IACUC or IRB protocols, etc).
- Ensure any potentially contaminated surfaces or equipment are appropriately decontaminated and that necessary decontamination forms are submitted to EH&S.
- Ensure all chemical, biological and radiological materials and/or hazards are appropriately remove. Contact EH&S as indicated in the procedures below for assistance.
- If contamination or hazards are identified by EH&S personnel upon lab close out, the PI/Lab Director will be responsible for ensuring the hazards are addressed.

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- In the absence of the PI/Laboratory Director, notify EH&S prior to closing, vacating, relocating, or renovating a laboratory.
- Responsible for all deficiencies not corrected by the PI/Laboratory Director.
- Responsible for non-fixed equipment or supplies left behind in the space.

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- Advise PI/Laboratory Director of precautions to be taken during transfer of biological, chemical and radioactive materials. Provide other guidance as needed.
- Conduct radioactive stock material transfers if transfers involve movement of such materials between unconnected buildings.
- When contacted by a lab for hazardous waste removal, schedule a waste pick up for the laboratory. EH&S will provide packaging materials for waste collection.
- When contacted for a laboratory closeout survey, verify all close-out activities have been completed appropriately. If contamination or hazards are identified, EH& S will notify the PI/Laboratory Director. The PI/Laboratory Director or Department Chair will be notified by EH&S once the close out process is complete and verified.

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AUTHORITY

By authority delegated from the University President, the Vice-President for Business Affairs is responsible for the safety of all University facilities. Under this authority, policies are developed to provide a safe teaching, research, service, housing and recreational environment.

PROCEDURES

Close-out procedures for hazardous materials in laboratories:

- Notification to Environmental Health and Safety (EH&S) is required prior to closing, vacating, relocating, or renovating a laboratory by submitting the Lab Closeout Reporting form. A minimum thirty (30) day advance notice is requested.
- The main contact for the closeout will receive an email confirmation indicating the request has been received by EH&S. The email will include the next steps and a link to a detailed lab closeout procedure checklist.

- Once the form is submitted, an EH&S representative will contact the lab within a week to schedule a lab closeout survey – there is no need to complete any items before the survey.
- During the survey, the EH&S representative will walk through the lab offering guidance and answering questions about what items need to be completed.
- A safety survey report will be generated through Gator TRACS based on what is found in the lab. This survey report will serve as the lab as a "to-do list" for a successful closeout.
- Throughout the following days/weeks, an EH&S representative will check in to verify the status of pending items. As items are completed, the actions in Gator TRACS can be closed.
- Once all items are closed, EH&S will update Gator TRACS and issue a final closeout completion

notice.

Chemicals

General

- Check refrigerators, freezers, fume hoods, biosafety cabinets and bench tops, as well as storage cabinets (above and below) for chemical containers and samples.
- For unwanted chemicals, determine which chemicals are usable and if another party is willing to accept the materials. Contact EH&S's Chemical Hygiene Officer to complete the transfer of chemicals in the inventory system from the originating lab to the receiving lab. If chemicals will be moved to another laboratory, ensure that the EH&S policy "Movement of Laboratory Owned Research Chemicals" (attached below) is followed.
- Any chemical that will be left behind must be in its original, undamaged container, properly capped (no parafilm or foil) with the original label still affixed to the container. Chemicals must not be older than 10 years. Any chemicals that do not these parameters must be disposed of by submitting a hazardous waste pick up request. Stock solutions, diluted solutions, or chemical mixtures formulated by the lab must be disposed of. Additionally, peroxide formers and acutely toxic chemicals cannot be left behind and must always be disposed of through EH&S Hazardous Materials Management.
- If a new user cannot be found, the chemicals can be disposed of properly through EH&S Hazardous Materials Management. **Under no circumstances may any chemical be disposed of into the drain, sewer or trash.**
    - Ensure that all waste containers of chemicals are properly labeled, sealed, and managed per the EH&S Laboratory Chemical Waste Management guidelines.
    - Hazardous waste labels are available through EH&S free of charge.
    - All lab containers (beakers, flasks, etc.) must be emptied and cleaned.
    - Submit a "Chemical Waste Pick Up Request" form to EH&S Hazardous Materials Management.
- Wash all fume hood surfaces and counter tops with soap and water.

Controlled Substances

- At all times, including during the close out process, controlled substances must remain locked in a substantially constructed cabinet or safe and accessible only to authorized personnel.
- The U.S. Drug Enforcement Agency (DEA) issues controlled substance registrations to individual researchers. Abandonment of a controlled substance is a violation of the DEA permit under which it was held.
- It is imperative that the PI maintain a valid DEA Controlled Substance registration, as a registration is required to dispose of the controlled substances.
- No DEA controlled substance can be abandoned or transferred to another researcher.
- Lab relocations within UF require that the PI send an addendum to both the Florida Department of Business & Professional Regulation (DBPR) and DEA with the new locations and expected move date.
- If the PI is retiring or moving from UF to another university, the drug products cannot be moved and must be disposed.

- EH&S Hazardous Materials Management **cannot take possession** of DEA controlled substances. Contact EH&S Hazardous Materials Management to obtain information on proper disposal methods.
- If the substance(s) is disposed of, include date, manner of disposal, and quantity of substance disposed. Keep disposal records for at least two years.

Compressed Gas Cylinders

- Remove gas connections, replace cylinder caps, and return cylinders to suppliers. All cylinders must be returned to the suppliers as EH&S Hazardous Materials Management cannot accept them.
- If cylinders are non-returnable, consult with EH&S Hazardous Materials Management for guidance as a last resort.

Biological Materials

- Dispose of unwanted biological materials per the Biological Waste Disposal Policy.
- Tissues/specimens in liquid preservatives require that the tissue and liquid be separated and the liquid disposed of as a hazardous (chemical) waste through EH&S. The preservative may not be poured down the drain.
- If any biological materials that do not require registration with the Biosafety Office need to be saved, locate the appropriate person to take responsibility for the material and notify the Department Chair.
- Note that Biosafety/IBC registered projects must be closed out with the Biosafety Office. Contact Biosafety at BSO@ehs.ufl.eduto ensure the change is made in Gator TRACS
- Biological materials associated with registered projects must be
    - properly inactivated and disposed of before departure, or
    - shipped to another institution, or
    - transferred to another UF PI who is, or can be, registered with the Biosafety/IBC for these materials.

Transporting Biological Materials

- Please refer to the Biological Materials Transport Policy below for requirements and guidelines.

Radioactive Materials

General

- All radioactive material must be disposed of as radioactive waste through EH&S Hazardous Materials Management by submitting the Chemical Waste and Radioactive Waste Pickup Request Forms or transferred to another authorized user.
    - If the radioactive material is to be transferred to an approved user at UF, ensure that the appropriate documentation is approved by the Radiation Safety Office prior to the transfer.

    - If the radioactive material is to be transferred to another licensee or returned to the manufacturer, make arrangements for the Radiation Safety Office to pick up the material for shipment. Contact them at 352-392-7359 or RSO@ehs.ufl.edu.
- Following removal/disposal of all radioactive material/waste, perform a swipe survey (and if appropriate, a radiation level survey for gamma emitters) of all former storage and use areas within the laboratories to be closed out.
    - All areas that measure > 100 dpm/100cm^2 must be decontaminated then reswiped/surveyed to assure decontamination. Equipment that cannot be decontaminated must be disposed of as radioactive waste. Contact Radiation Safety for details and assistance.
- After the final swipe survey demonstrating all areas and equipment in the laboratory are <100 dpm/100cm^2, schedule an official close out survey with Radiation Safety. Radiation Safety personnel will complete a closeout survey, remove all radioactive material postings and notify the PI that the laboratory has been released.
- If the PI fails to satisfactorily complete the above steps, the Department Chairperson will be responsible for the prompt completion of the required close out steps.

Radiation Producing Devices

The Radiation Safety Office is required to maintain an inventory of all radiation producing devices to confirm registration with the State of Florida Department of Health.

- Each PI is responsible for notifying the Radiation Safety Office if there is any change which would render the registration inaccurate, including change of use location, sale, transfer or disposal of any radiation machine or major component thereof. Transfers are defined as follows:
    - **On Campus Transfers**
      Since approval for the procurement and use of a radiation producing device was initially given for the original working area and proposed research under the supervision of the approved PI, devices shall not be transferred from one area to another or to another individual without approval of the Radiation Safety Office.
    - **Off-Campus Transfers**
      Radiation producing devices shall not be shipped or transferred to, or from any University facility, or outside organization without prior approval of the Radiation Safety Office.
    - **Disposal of Radiation Producing Device**
      Prior to the disposal of obsolete or irreparable equipment, the Radiation Safety Office must be notified in order to amend inventories.

Laboratory Equipment

- All equipment must be in a condition that is clean and safe for handling.
- Equipment that is or may be contaminated with a chemical, biological, radioactive or other hazardous material must be decontaminated before it is moved, disposed of/surveyed out of UF’s

asset inventory, shipped offsite, or repaired.
- This will include, but is not limited to fume hoods, refrigerators, freezers, centrifuges, biological safety cabinets, incubators, ovens, etc.
- Document this decontamination on an EH&S Equipment Decontamination Form. Once the form is approved by EH&S, the submitter and PI will receive an email confirmation, which must be printed and affixed to the equipment.
- When submitting the decontamination form, always include an asset tag number for equipment that will be disposed of through MyAssets. Approved forms that include an asset tag number are automatically routed to the pickup request for surplus property.

Note that Biosafety Cabinets (BSCs, biosafety “hoods”) used with biohazards must be professionally decontaminated with gas/vapor before moving, surveying out/disposing of, or repair of contaminated plenums within the cabinet. Contact the vendor (e.g. Precision Air Technologies at 352-332-4653) to decontaminate this equipment *before* submitting the EH&S Equipment Decontamination Form to the Research Safety Office.

Laboratory Supplies

- Clean, non-contaminated laboratory items must be labeled with a “Non-Contaminated Waste” label. EH&S provides labels free of charge Stickers may be placed on the trash bin or on the outside of a closed trash bag containing unwanted items.
- Glassware that will be left behind must be washed, decontaminated, and stored in the cabinets. Broken or unwanted glassware must be disposed of in a box lined with a plastic bag. Label the box as non-contaminated waste.

Shared Areas

All shared space (labs, equipment rooms, storage areas, cold rooms, dark rooms, autoclave rooms, etc.) must be cleared of materials and cleaned by the departing staff. Otherwise, the Department Chair or another PI must assume responsibility for the space and its contents.

Contact Information

- Research Safety: Researchsafety@ehs.ufl.edu 352-392-1591
- Chemical and Lab Safety: Labsafety@ehs.ufl.edu 352-392-1591
- Biological Safety: BSO@ehs.ufl.edu 325-392-1591
- Radiation Safety: RSO@ehs.ufl.edu 352-392-7359 or 352-392-1589
- Hazardous Materials Management: HWM@ehs.ufl.edu 352-392-8400

[su_spoiler style=”fancy” icon=”chevron” title=” Policy: Movement of Laboratory Owned Research Chemicals “]

Purpose

To ensure the safe handling and movement of research chemicals from lab to lab and building to building within campus. This does not affect the movement of new chemicals being delivered.
Effective Date: September 1995, Revised February 2020
General Requirement for Transport

Departmental staff may move chemical bottles from one laboratory to another laboratory within campus if the following conditions are met:

- Staff who will be moving the bottles must be trained in the proper handling of chemicals.
- Chemical bottles and containers must be in good condition and adequately labeled.
- Chemical bottles or containers are adequately labeled.
- It is recommended that leak proof tubs be used to move liquids, but cardboard boxes may be used if they are in good condition and are sturdy enough to handle weight of the bottles of chemicals.
- Boxes are not excessively large to prohibit overloading or safe handling.
- Bottles of chemicals must be segregated and packed into boxes by hazard class. Non-compatible chemicals may not be packed or moved in the same box. (call EH&S for further information.)
- Glass bottles and all bottles containing liquids must be packed in boxes with a buffer of vermiculite or other similar absorbent material. Plastic or unbreakable bottles of powdered or non-liquid chemicals may be packed with compatible chemicals, without absorbent material.
- Each box of chemicals will be inventoried for contents as it is being packed. Required information will include chemical name, number of bottles and volume/weight in each.
- Boxes must be labeled distinctly with the corresponding inventory page.
- Copies of the inventory must be kept in each box, with the moving crew and in the originating lab until the transfer is complete.
- The preferred transport method is a sturdy handcart with a lip on four sides to prevent boxes/tubs from sliding off. Cart(s) used to move boxes/tubs must be sturdy enough to handle weight of the boxes and terrain it will be moved over.

- With the written approval of a transport plan submitted to the EHS Hazardous Materials Management Office (HWM@ehs.ufl.edu 352-392-8400), chemicals may be moved by state vehicle only.
    - Chemicals may not be transported by personal vehicle or public transport due to insurance liabilities.
    - Chemicals may not be transported in the passenger compartment of the state vehicle.
    - Additional federal transport regulations apply for transport over public roads.

- Adequate personal protective equipment and spill control material must be available in the event of a spill. Staff must be trained in the proper method of use.
- Any compressed gas cylinder being moved must be secured on a cart or rack. Small lecture bottles must be packed as bottles (see above).

EH&S must be notified of the movement of these chemicals prior to the start and at the completion of the move. Once notified, EH&S will complete the transfer of chemicals from the originating lab's

chemical inventory to the receiving lab’s chemical inventory.

If the above procedures cannot be met by the department(s) involved with the moving of these chemicals, contact the EH&S Office at 352-392-1591 for assistance.
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Biological Materials Transport Policy

Purpose

To prevent accidents and to ensure that UF personnel, property, and the environment are not exposed to biological materials during their transport from lab to lab and building to building within campus. It is intended to ensure compliance with local, state, and federal guidelines and regulations concerning the transport of biological materials.
Effective Date: September 1995, Revised February 2020

General requirements for transport of biological materials within the UF campus

- Personnel transporting biological materials shall be appropriately trained, including on how to handle spills. This includes Bloodborne Pathogen training for those transporting human blood, and training specific to the biohazard being moved.

- The preferred transport method is to use a clean, leak-proof cart with a lip on four sides to prevent containers from sliding off and to contain any potential spills. The materials themselves must be in sealed containers, clearly labeled with the contents and applicable hazard(s).
- If hand-carried or transported on a cart that does not meet the above requirements, the container must be sealed, clearly labeled as above, and packaged within ANOTHER tightly sealed, clean, leak-proof, shatter-proof container (double containment) OR packaged as it was when first shipped to the laboratory.

- For infectious and/or biohazardous material:
    - Double contain the items in plastic leak-proof containers within sturdy outer packaging. Include absorbent material within the containers as well as padding to minimize movement of the container(s) within the outer packaging.
    - Wipe the outer container with an appropriate disinfectant before removing it from the laboratory and apply a biohazard sticker. Put the laboratory name and contact information on the package.
- Biological materials shall be transported from laboratory to laboratory without any stops in public areas such as offices, cafeterias, or restrooms. Limit transport through public or highly-traveled areas and use freight elevators when possible.
- If a vehicle must be used, contact the EH&S Biosafety Office for instructions. Note that materials classified by the US Dept. of Transportation as dangerous goods or hazardous materials may not to be transported in a personal vehicle or public transportation. This is both a safety and liability issue.