

Off-Boarding and Space Closeout Procedures

Overview

Proper safety culture includes appropriate space closeout and personnel off-boarding to assure prevention and minimization of risks and hazards. Moving or relocating is a challenge and this procedure helps to streamline the process. This procedure supports and supplements established University policy, procedures and checklists on Faculty, Staff, Student Employee & Affiliate Departures and Space Management.

Individuals (faculty, staff, student employee, and affiliates) departing the University or vacating KU Lawrence Campus spaces *must* collect, evaluate, and coordinate the processing of all hazardous and nonhazardous materials to assure proper asset tracking, property accounting, reuse, redistribution or needed disposal. Individuals and/or units working with biological, chemical, and/or radiological materials as well as any equipment from a space that contain potential hazards must ENSURE:

- All materials and containers are properly labeled with their constituents identified;
- Wastes are properly containerized, segregated, and labeled with EHS Hazmat label;
- A knowledgeable person is available to help identify/review materials and hazards;
- The safety of all personnel;
- The University remains in compliance with federal, state, and local regulations;
- The University remains fiscally responsible;
- The space is available as soon as possible to new users.

The Principal Investigator/Authorized Supervisor has primary responsibility to ensure that all materials are properly identified, evaluated, and addressed before leaving or vacating space. Unit heads are also responsible for effectively managing and facilitating the proper off-boarding and space closeout. Collectively, it is their responsibility to ensure the area is returned to its move-in condition and prepared for the next occupancy, which includes, but is not limited to:

- Cleaning and decontaminating work surfaces (hoods, storage cabinets, counters, equipment, etc.);
- Removing all items from drawers and disposing of all trash;
- Arranging for the removal of all unwanted equipment, furniture, and supplies;
- Environment, Health & Safety can provide guidance and assistance;
- EHS Radiation Safety will clean and survey all surfaces in radiochemical labs;
- Complete the EHS Off-Boarding/Space Closeout Checklist at end of this document. Send to the unit head for signature and then forwarded to the EHS Dept.

Chemical Accountability

Proper management of chemicals is essential to successful closeout and space preparation for new occupancy. Chemicals are an asset and must undergo proper inventory accounting prior to transfer, redistribution, or needed disposal. Chemicals and chemical wastes vary widely across campus and identifying the chemical constituents in each container helps to assure proper handling and disposal. EHS can secure the best surplus redistribution or disposal method when these steps are followed:

- PI/Authorized Supervisor must ensure a knowledgeable person is available to help identify/review chemical materials and wastes;
- Ensure the contents of each container of chemicals are identified on the container;
- An inventory of all chemicals in the space must be current and provided;
- Chemicals approved to be transferred must be segregated and properly packaged for transport per EHS instructions;
- Chemicals remaining at the University for proper reuse or redistribution must be usable and in good condition. EHS will provide instructions and assistance with surplus chemicals;
- Chemicals to be transported between campus buildings require EHS assistance to assure compliance with Federal, State, and Local Government regulations;
- Confer with EHS to identify how chemicals for disposal will be segregated and collected within the lab and clearly indicate which ones are to be disposed. NO chemicals are to be disposed by evaporating, pouring down the drain, or disposing in the regular trash without an EHS approval.

Gas Cylinders

- Assure all cylinders are properly labeled and identified.
- Before moving, remove gas connections and replace cylinder caps.
- Return cylinders to storerooms or directly to suppliers depending on your acquisition.
- If cylinders are non-returnable, contact EHS for proper disposal.
- Cylinders, depending on hazard of contents, can be expensive for disposal. Costs may be charged back to PI and/or Dept. for cylinder disposal.

DEA Controlled Substances

Controlled substance permits are issued to individual researchers by the United States Drug Enforcement Agency (DEA). Abandonment of a controlled substance is a violation of the DEA permit under which it was held. It is the permit holder's responsibility to dispose of these substances by performing the following:

- Segregate and secure controlled substances in your inventory from other chemicals.
- Drugs administered under the permit of the Attending Veterinarian of the ACU must be returned to the Attending Veterinarian of the ACU.
- Permission to transfer ownership of a controlled substance to another individual must be granted by the DEA prior to transfer.
- If controlled substances are possessed on an individual's permit, then that individual must make arrangements with the DEA prior to disposal or transfer.
- EHS can provide advice and assistance in the disposal of DEA controlled substances.

Biological Materials Accountability

Biological material (infectious/pathogenic materials, tissues, samples, specimens, animal carcasses, etc.) must be handled according to applicable regulatory and policy requirements. EHS will provide advice and assistance.

- Biological samples to be transferred or saved require an appropriate, knowledgeable person to take responsibility for them. This individual must work with EHS to establish and implement necessary procedures to facilitate successful transfer or storage.
- All infectious/pathogenic materials must first be rendered non-viable by autoclave or chemical treatment means prior to disposal.
- Sharps must be collected into an appropriate sharps container. If biologically contaminated, sharps must be decontaminated by autoclave or chemical treatment first, then placed into an appropriate secondary container and taken to building dumpster for disposal.
- EHS must be notified prior to any transfer or disposal of Select Agents. These agents are defined in Sections 73.4 and 73.5 of 42 CFR Part 73.
- All animal carcasses must be disposed in accordance with IACUC/ACU & EHS requirements.

Radioactive Material, Source and Laser Accountability

EHS Radiation Safety begins working with the laboratory upon notification of the Principal Investigator /Authorized Supervisor's plans and before the lab is vacated to prepare the lab for decommissioning and/or reuse. This communication provides the needed support and clarification about who will become the owner of the equipment and how materials need to be made ready.

- The value of radiochemical sources will be determined and sources will be secured by Radiation Safety.
- Authorized users will collect labeled items in the laboratory and place them in restricted areas. Labels identifying 'caution, radioactive material,' may not be removed by the researcher nor placed in the regular office trash.
- Radiation Safety will:
 - Disassemble restricted work areas.
 - Evaluate the survey requirements for all laboratory refrigerators and freezers, centrifuges, water baths, incubators, etc., for final release for unrestricted use.
 - Package the waste in the laboratory for disposal to secure the best disposal option.
 - Prepare the bench tops, sinks and drains, drawers and cabinets, and floors for the decommissioning survey. A building historical assessment is required and these procedures are necessary to meet regulatory requirements.
- Any labeled equipment must be certified clean and released for unrestricted use before the equipment is moved from the lab.
- Laser uses will be evaluated by the Laser Safety Officer.

Materials Removal, Transport & Shipping

Biological, chemical, or radiological materials must not be removed from a space, transported across campus nor shipped off-campus without prior EHS review and approval. These materials must be transported/shipped in accordance with applicable U.S. Department of Transportation (DOT) regulations. The regulations require very specific packaging materials, labeling, and training of the person packaging the material. An individual who violates these regulations may face civil or criminal penalties. EHS will provide advice and assistance with proper transportation, but will not be responsible for any possible costs for shipping or transportation of these hazardous materials offsite.

Equipment/Space Cleaning & Disposal

Laboratory/Space equipment to be left for the next occupant must be properly decontaminated and cleaned before departing the space. Mark the equipment indicating that it has successfully been decontaminated for chemical or biological contamination.

- Clean fume hood surfaces and lab benchtops.
- Decontaminate surfaces of biosafety cabinets with appropriate disinfectant.
- Defrost and clean refrigerators and freezers.
- Clean centrifuges, incubators, drying, or curing ovens.
- If exhaust or filtration equipment has been used with hazardous substances or organisms, contact the EHS office.
- If computer equipment is to be discarded, follow IT E-waste instructions.
- If laboratory equipment is to be discarded, be aware that many types of equipment may contain hazardous material that must be removed prior to disposal. For example, refrigerant, capacitors, transformers, mercury in switches, mercury in thermometers, and chemicals must be removed before disposal. If you know of a particular hazard, please label the equipment with the internal hazard to assist others not familiar with this equipment. Contact the EHS Dept. for assistance.

Shared Storage Areas

Departing individuals must carefully review any shared spaces or equipment in order to locate and appropriately dispose of their materials. Laboratory supervisors should work together and clarify who is responsible for shared facilities and equipment:

- Review storage of chemicals on shelves, in cabinets, and in shared refrigerators or freezers.
- Review storage of biologicals in shared refrigerators and freezers.
- Review shared cold rooms, stock rooms, waste collection areas, etc.
- Do not leave items behind and all items must be handled per the previously identified requirements.

Off-Boarding/Space Closeout Check-List

Use this form/checklist to document that previous sections and their requirements have been addressed

Closeout Items	Date Completed or NA
EHS Notifications (as soon as knowledge of formal move)	
EHS Hazmat Services	
EHS Radiation Safety Services	
Chemical Accountability	
Gas Cylinders	
DEA Controlled Substances	
Biological Materials Accountability	
Radioactive Material, Source and Laser Accountability	
Materials Removal, Transport & Shipping	
Equipment/Space Cleaning & Disposal	
Shared Storage Areas	
EHS Visit	

Once this checklist has been completed, sign below and send it to Environment, Health & Safety (EHS) at ehsdept@ku.edu

Departing Individual Signature _____ Date _____

Supervisor Signature _____ Date _____

Spaces Closed Out

Building: _____ Room(s): _____

Comments:

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EHS reviewed: _____

EHS approved: _____