



University of Nevada, Reno
Environmental Health and Safety Policy

Title: Laboratory Closeout/Transfer Policy

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POLICY:

Closeout or transfer of responsibility of laboratories that possess biological, chemical, or radiological materials must be conducted in a manner that ensures that all such materials are identified and labeled and, at the proper time, transferred to another responsible party or properly disposed of.

RESPONSIBLE AUTHORITY:

Vice President for Research; Environmental Health and Safety Department

SCOPE:

This policy applies to all laboratories, stockrooms, and storerooms maintained by UNR that possess biological, chemical, or radiological materials.

BACKGROUND:

It is preferred that all laboratory assets be reassigned to faculty who will use the materials, products and devices for ongoing useful purposes. Chemical, biological, and radiological materials, however, are frequently left behind when laboratory researchers end their association with the university, or otherwise closeout or transfer responsibility of a laboratory. These orphaned materials are often improperly labeled and inappropriately packaged. In some instances these materials are completely unlabeled, effectively qualifying them as unknown hazardous materials. These materials represent increased health and safety risks to personnel, as well as financial risks due to characterization and disposal costs, and regulatory fines. Additional costs may include hazardous material response, facility repair, and equipment replacement resulting from fire or spills of these orphaned materials.

REFERENCE REGULATIONS:

- 29 CFR 1910.1450, "Occupational Exposure to Hazardous Chemicals in Laboratories"
- 42 CFR 73, "Possession, Use, and Transfer of Select Agents and Toxins"
- 7 CFR 331; 9 CFR 121, "Agricultural Bioterrorism Protection Act of 2002; Possession, Use, and Transfer of Biological Agents and Toxins"
- NAC 459, "Hazardous Materials"
- National Institutes of Health, "NIH Guidelines for Research Involving Recombinant DNA Molecules" (latest edition)
- Centers for Disease Control and Prevention/National Institutes of Health, "Biosafety in Microbiological and Biomedical Laboratories" (latest edition)

DEFINITIONS:

Laboratory – The physical space for which a PI is responsible and uses for the purpose of conducting laboratory work. For purposes of laboratory closeout or transfer of responsibility, instrumentation, hazardous materials, and equipment for which the PI is responsible or that may be contained in laboratory space for which the PI is responsible

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or shares responsibility, are subject to this policy no matter where the space is located. Responsibility can be gained through formal assignment; informal acceptance of responsibility through primary use, maintenance, or repair; or acquisition by purchase or other means.

Closeout and/or Transfer of Responsibility for Laboratories – The discontinuance of all laboratory operations for which a specific PI is responsible, accompanied by written acknowledgement by the PI. Such acknowledgement indicates that the PI, and any personnel working under his or her supervision, will vacate the laboratory space as specified by the PI. The PI need not end their association with the University, or physically leave the University, for a laboratory closeout or transfer of responsibility of the laboratory to occur.

RESPONSIBILITIES:

Deans, Department Chairs, and Directors

Ensure that all faculty and principal investigators are aware of the responsibilities and procedures contained in this policy.

Provide administrative enforcement of this policy with regard to the closeout or transfer of responsibility of laboratories under their administrative responsibility.

Ensure that any PI who is closing out or transferring responsibility of their laboratory is informed of this policy and is provided with the “Laboratory Closeout/Transfer Notification Form” (Appendix I) and the “Laboratory Closeout/Transfer Checklist” (Appendix II).

Ensure that a copy of the completed and signed Laboratory Closeout/Transfer Checklist is provided to the new occupant of laboratory space prior to their occupancy.

Academic Departments and Other Administrative Units

The PI’s home academic department or other administrative unit is responsible for costs arising from noncompliance with this policy when the PI has physically left the University or does not have sufficient operating funds to cover such costs. Examples of these costs include analysis of unknown or incompletely characterized hazardous materials; disposal of hazardous materials requiring special handling or treatment (for example, shock sensitive chemicals and mixed waste); and regulatory fines or other regulatory penalties associated with improper handling, or disposal of hazardous materials and wastes.

Principal Investigator/Laboratory Supervisor

When a laboratory ceases operations for any reason or responsibility for the laboratory is transferred to another PI, ensure that the laboratory is closed out or transferred in accordance with this policy. Each PI is responsible for all instrumentation, hazardous materials, and equipment that is contained in any laboratory space for which they are responsible or share responsibility, no matter where the space is located.

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Ensure that materials transferred to another laboratory (on campus or off campus) are packaged, labeled, and shipped in accordance with local, state, and federal regulations covering the specific hazardous materials to be transferred.

When a laboratory closeout or transfer is not conducted according to this policy, the PI is responsible for the financial costs arising from the noncompliance through the use of operating funds under their purview. Examples of such costs include analysis of unknown or incompletely characterized hazardous materials; disposal of hazardous materials requiring special treatment or handling (for example, shock sensitive chemicals and mixed waste); and any regulatory fines or other regulatory financial penalties associated with improper labeling, handling, or disposal of hazardous materials and wastes.

Environmental Health and Safety Department

When written notification of a laboratory closeout or transfer is received (via the Laboratory Closeout/Transfer Form), EH&S will schedule a meeting with the PI (or designated alternate) currently responsible for the laboratory to evaluate specific requirements that must be completed prior to the closeout or transfer. Based on this evaluation, EH&S will provide a written summary to the responsible PI within 15 days after the evaluation.

Provide chemical waste containers, and sharps containers and autoclavable waste bags for biohazardous waste (all limited to standard EH&S-supplied containers and bags).

Provide guidance on characterization, handling, treatment, and disposal of biological, chemical, and radiological waste. Collect, transport, store, and coordinate final disposal of biohazardous sharps waste, and chemical and radiological waste. With regard to hazardous materials requiring special handling, treatment, or disposal (for example, shock sensitive compounds), EH&S provides technical guidance and assistance in coordinating removal and disposal by a third party (as required). Financial costs associated with handling and disposal of these materials are considered “exceptional expenses” and are the responsibility of the PI, with the academic department or administrative unit being secondarily responsible.

Provide guidance and assistance on packaging and labeling of hazardous materials for transfer or shipment.

PROCEDURES:

1. All laboratory PIs who are closing out or transferring responsibility of their laboratories must submit *Laboratory Closeout/Transfer Notification Forms* (Appendix I) to EH&S at least 30 days prior to scheduled closeout or transfer date. This advance notice is needed for laboratory clean out, transfer or disposal of hazardous materials, and to ensure compliance with regulatory requirements. Upon receipt of a notification form, EH&S will schedule a meeting with the PI (or designated alternate) to evaluate specific requirements that must be completed prior to the closeout or transfer. EH&S will provide the PI with a written summary of the requirements within 15 days after the evaluation.

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2. The PI must also complete the *Laboratory Closeout/Transfer Checklist* (Appendix II), and submit it to their department (with a copy to EH&S).

The PI will be considered responsible for the laboratory space until all action items on the Checklist have been completed, and the Checklist has been signed by all parties and submitted to the PI's home department, with a copy of the Checklist sent to EH&S.

The academic department must provide a copy of the completed and signed checklist to the new occupant prior to their occupancy of the laboratory.

When responsibility for a laboratory is transferred from one PI to another, the receiving PI must sign the Checklist indicating that they have accepted responsibility for the laboratory in its current condition.

3. Prior to any PI closing out or transferring his or her laboratory, all biological, chemical, and radiological materials that will remain at UNR must be transferred to another UNR PI or Department (by mutual agreement). Radiological materials can only be transferred to a user who is currently authorized to maintain and use the specific material. All transfers of radiological materials must be coordinated by the UNR Radiation Safety Officer (RSO). Chemical containers transferred to another UNR PI require that the UNR chemical inventory be updated to reflect the relocation. The PI will need to consult with EH&S as to the most efficient method to update the inventory database. Biological materials can be transferred to another PI who is authorized for the agent(s) by a currently approved Memorandum of Understanding and Agreement (MOUA).

These materials must be in appropriate containers and be properly labeled. Chemicals must be labeled with the chemical name, hazard information, and date the material was received or last used (if known). Peroxide-forming chemicals must be tested for peroxide levels, with the test date and results listed on the chemical container. Radioactive materials must be labeled with the identity of the radioisotope, activity, and date, and be packaged in leak-proof secondary containers. Biological materials must be labeled with the name of the biological agent, and hazard information (including biosafety or risk level). Biological materials must be packaged in leak proof secondary containers, as appropriate for the biosafety level.

EH&S personnel will assist in the safe transport of biological, chemical, and radiological materials on the university campus.

4. Transport of all radioactive materials that are going with the PI must be coordinated through the RSO. This will ensure that the university's radioactive material inventories are current, and that materials are properly packaged and shipped.
5. Off-site shipment of biological materials and chemicals is the responsibility of the PI. EH&S will provide consultation on proper packaging and labeling of these materials and inspect materials prior to shipment. It is the responsibility of the PI to

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ensure that these materials are shipped only to an authorized institution in accordance with state and federal regulations.

6. All laboratory equipment and labware, regardless of whether it is to be transferred to another institution or stay at UNR, must be cleaned and decontaminated. Radiological decontamination must be verified by the RSO. This will protect new lab occupants from the unnecessary risk, expense, and inconvenience presented by contaminated materials.
7. All radiation monitoring badges (personnel dosimeters) must be returned to the RSO prior to the PI's exit, as well as any radiation detection or shielding devices that may have been borrowed in support of special projects.

RELATED DOCUMENTS:

UNR Chemical Hygiene Plan
UNR Biosafety Manual
UNR Radiation Safety Manual

ATTACHMENTS:

Appendix I – Laboratory Closeout/Transfer Notification Form
Appendix II – Laboratory Closeout/Transfer Checklist

**APPENDIX I
Laboratory Closeout/Transfer Notification Form**

The PI who is closing out or transferring responsibility of the laboratory is required to notify EH&S prior to doing so. The PI must complete this form and submit it to EH&S (MS 328) at least 30 days prior to closing out or transferring his or her laboratory. EH&S will schedule a meeting with the PI (or designated alternate) and provide written feedback to the PI within 15 days after the meeting.

Name of PI:

Expected Closeout/Transfer Day:

Department:

Department Chair:

Laboratory rooms under control of PI:

PI Office and Phone at UNR:

PI Address and Phone After Departure from UNR (as applicable):

Hazardous Materials in Labs (check all that apply):

- Chemicals Biological Agents Radioisotopes
 - Radiation Producing Equip. (x-rays, lasers)
 - Other (specify) _____
 - Waste (specify chemical, biological or radiological) _____
-

Signature of PI

Date

Signature of Department Chair or Director

Date

APPENDIX II
Laboratory Closeout/Transfer Checklist

The PI who is closing out or transferring the laboratory must complete this checklist and sign it at the first signature section, thereby indicating that all items have been completed. This checklist must also be signed by the Chair or Director of the receiving department, and EH&S, prior to the PI relinquishing responsibility of the laboratory space. The original signed checklist is submitted to the receiving department, and a signed copy is sent to EH&S (Chemical Hygiene Officer, MS 328).

If responsibility for the laboratory is later transferred from the receiving department to a new PI, the department will provide the new PI with a copy of the original signed checklist. Upon transfer of the laboratory, the receiving PI must sign the checklist at the second signature section, indicating that they accept responsibility for the laboratory and its contents in their current condition (exceptions should be noted in writing as an attachment). The checklist must also be signed by the transferring Chair or Director, and EH&S. The checklist with both sets of original signatures will be provided to the receiving PI, with copies provided to the transferring department and EH&S.

- _____ 1. "Laboratory Closeout/Transfer Form" completed and submitted to EH&S 30 days prior to closing out the laboratory.

- _____ 2. All chemicals staying at UNR are properly packaged and labeled, responsibility for these materials has been accepted by a UNR Department or another PI, and inventory changes have been coordinated with the EH&S Chemical Inventory Coordinator.
Specify names, departments and locations: _____

- _____ 3. All biological agents staying at UNR are properly packaged and labeled, and responsibility for these materials has been accepted by a UNR Department or another PI who is currently authorized for the biological agents by an approved MOUA.
Specify names, departments and locations: _____

- _____ 4. Chemicals and biological agents to be shipped are packaged and labeled in accordance with applicable regulations (DOT, IATA), and required permits have been attained.

- _____ 5. Chemical and biological agents that are not remaining at UNR and are not being transferred are disposed of in accordance with established biosafety and chemical hygiene procedures.

- _____ 6. All radioactive materials are properly packaged and labeled, and inventory changes have been coordinated through the RSO.
- _____ 7. Shipment of radioactive materials has been coordinated through the RSO.
- _____ 8. All chemical waste is properly packaged and labeled, and a request for pickup of chemical waste has been submitted to EH&S.
- _____ 9. All laboratory equipment and labware has been cleaned and decontaminated.
- _____ 10. Final radiation lab surveys are completed, with results sent to the RSO.
- _____ 11. Radiation badges have been returned to EH&S.
- _____ 12. All personal materials have been removed.

First Signature Section: Transfer From PI to Receiving Department Chair/Director

_____	_____
Signature of Transferring PI	Date
_____	_____
Signature of Receiving Department Chair	Date
_____	_____
Signature of EH&S Representative	Date

Second Signature Section: Transfer From Department Chair/Director to Receiving PI

_____	_____
Signature of Transferring Department Chair/Director	Date
_____	_____
Signature of Receiving PI	Date
_____	_____
Signature of EH&S Representative	Date