

Laboratory/Equipment Decommissioning Program

Responsible Administrator: Industrial Hygiene Reviewed: January 2024

Summary: This section outlines the policy and procedures related to the Laboratory/Equipment Decommissioning Program that is administered through the Environmental Health and Safety (EHS) Department.

1.	Program Description	1
2.	Scope	2
3.	Definitions	2
4.	Responsibilities	3
5.	Program Components	3
6.	Special Procedures	6
7.	Reporting Requirements	8
8.	References and Appendices	8
Ap	pendices	

Appendix A - Sample Checklist for Needs Analysis and Scoping

Appendix B - Lab Equipment/Area Assessment/Clearance Testing Process (Flowchart)

Appendix C - Request for Equipment/Laboratory Clearance Testing and/or Decommissioning (Online Form)

Appendix D - EHS Clearance Tag

1. Program Description

This program provides procedures to persons who are responsible for, or oversight over a laboratory or laboratory equipment that is being commissioned. These responsible persons may be the Principal Investigators, Facility Managers/Directors, Laboratory Manager/Administrator, research staff, and other stakeholders. These responsible persons are tasked with the safe and proper decommissioning of a laboratory or laboratory equipment, which may include the transfer and/or disposal of hazardous materials. The program aims to provide a comprehensive roadmap for the decommissioning process. The procedures outlined in this program may be used wholly, or its use may be limited to applying the relevant sections as dictated by the project needs.

The goal of the program is to minimize the potential health and safety risk to:

• the public (movers, salvage equipment buyers, etc.) who may have direct contact with items being decommissioned;

- the environment;
- personnel involved with the renovation/demolition/construction;
- future users and occupants.

2. Scope

- 2.1. These procedures apply to persons who are responsible for, or oversight over a laboratory or laboratory equipment that is being commissioned when:
 - Leaving the university and closing a laboratory
 - Retiring and closing his/her laboratory
 - Relocating his/her laboratory to a different building on campus
 - Leaving the university but transferring responsibility of his/her laboratory to another researcher
 - Disposing of laboratory equipment for salvage or waste
 - Preparing laboratory equipment for repair, or transfer to a new owner

3. Definitions

Clearance Criteria- the set of rules/levels, based on regulations or best practice methodologies, which is referenced to determine when lab equipment/area has met the requirements for decommissioning.

Decommission – Action to remove an item, i.e., laboratory or laboratory equipment, from service. It is a process to ensure that the item meets EHS requirements for its next use and/or handling, as in the case of salvage or repair.

EHS Coordinator – EHS liaison assigned to individual schools.

EHS Subject Matter Expert (SME) – EHS staff who provides the knowledge and expertise in a EHS specific subject or technical area.

EHS Surveyor – EHS staff who performs the assessment, sample collection and testing, renders interpretation of analytical results and provides guidance on follow-up actions.

Responsible Person(s) – A person or persons designated to be responsible for, or to have oversight over a laboratory or laboratory equipment being decommissioned. Such person(s) can be the Principal Investigators, Facility Managers/Directors, Laboratory Manager/Administrator, research staff, and other stakeholders.

4. Responsibilities

- 4.1. The Responsible Person(s) is accountable for the proper disposition of all hazardous materials and decontamination of all affected items when a laboratory or laboratory equipment is decommissioned. All hazardous materials must be either moved, discarded, or responsibility transferred to another investigator. All clearance assessments and/or testing must be coordinated and overseen by the Responsible Person(s) or designee.
- 4.2. EHS is responsible for guiding the stakeholders on the safe and proper transfer and/or disposal of hazardous materials when decommissioning a laboratory and/or laboratory equipment. EHS may also provide clearance assessments and/or testing or provide guidance and direction on how to accomplish clearance assessments/testing. EHS provides final approval of the decommissioning effort.

5. Program Components

In the decommissioning process, there are typical steps performed to varying degrees:

- 1) Identify the item or area for decommissioning
- 2) Determine the scope of the project
- 3) Collect known data (how equipment was used, potential contaminants, history of lab use, presence of asbestos/lead etc.)
- 4) Review the data and determine the potential contaminants of concern
- 5) The Responsible Person(s) or designee coordinate* or perform preparation activities for items slated for decommissioning. These activities include:
 - a. Decontamination/cleaning of lab equipment, work surfaces, etc.
 - b. Disposal of hazardous wastes
 - c. Removal of hazardous materials

*The Responsible Person(s) or designee may engage a qualified contractor to accomplish the preparation activities.

- 6) Perform contaminant assessment and analysis (visual assessment, sampling and laboratory analysis, etc.)
- 7) Conduct hazard mitigation/remediation as warranted
- 8) Approve the completion of the decommissioning process (approval indicates that the clearance criteria have been met) and provide notice to proceed.

The following program components distill the steps into distinct categories. The categories provide the Responsible Person(s) with a roadmap for planning and executing a decommissioning project. Not all of the components are applicable to a project; rather, apply the program component that best meets the scope of the project. EHS is a resource for help in determining the components germane to the project.

The program components are:

5.1. Needs Analysis and Scoping

At this component of the decommissioning process, the Responsible Person(s) should identify and develop a scope of work, and identify the resources needed for the project. The EHS Coordinator, if there is one affiliated with the project area, is a valuable partner in identifying the appropriate EHS subject matter expert(s) who can provide insight to a project.

In cases involving lab equipment moves, disposal, or repairs, project scoping is simple and straightforward. When decommissioning is required due to any size construction work (which can range from flooring replacement to whole lab renovation), a thorough analysis of the needs and a comprehensive identification of the scope of the project are more critical. <u>Appendix A</u> Sample Checklist for Needs Analysis and Scoping contains a sample checklist of items to consider during a construction/ decommissioning project.

5.2. Risk Assessment and Characterization

This program component identifies the potential areas of concern by using known hazard data. The information is used to determine if there is a potential risk to the public (movers, salvage equipment buyers, etc.) through direct contact and/or environmental impact, to personnel involved with the renovation/demolition/construction, and/or future users and occupants. After the risk is assessed and characterized, clearance assessment and testing may be warranted, as well as the remediation/mitigation of found hazards.

5.2.1 Decommissioning of Laboratory Equipment/Laboratory Area

All laboratory equipment and/or area is subject to clearance assessment/testing performed by an EHS Surveyor prior to moving, salvage, disposal, or repair. The assessment/testing request is initiated by submitting a "<u>Request for Equipment/Laboratory Clearance Testing and/or</u> <u>Decommissioning</u>" through the EHS website. The request may be submitted by the Responsible Person(s) or designee.

Appendix B Lab Equipment/Area Assessment/Clearance Testing Flowchart contains the flowchart that depicts the lab equipment/area assessment/clearance testing process. **Appendix C** Request for Lab Equipment/Area Testing and/or Decommissioning (Online Form) shows the "<u>Request for Equipment/Laboratory Clearance Testing and/or</u> <u>Decommissioning</u>" online form.

5.2.2 Decommissioning of Laboratory Equipment/Laboratory Area Due to Construction

The process is more involved when decommissioning is required due to any size construction work (which can range from flooring replacement to whole lab renovation). The laboratory equipment/area is still subject to section 5.2.1 of this program. Additional assessment and testing for other potential contaminants, such as asbestos and lead, may need to be performed. The Responsible Person(s) must confer with the appropriate EHS SME to determine scope and execution of the additional assessment.

5.3. Remediation/Mitigation

The remediation and/or mitigation of found hazards are performed to eliminate or reduce the health, safety, and environmental risks to the project stakeholders. The extent of the remediation/mitigation is based on the scope of the project. The clearance criteria are defined by the EHS SME based on regulatory requirements or best practice methodologies.

In the case of laboratory equipment, the process requires that the items are decontaminated by the users or their designee prior to the arrival of the EHS Surveyor. The Responsible Person(s) must ensure that the process is followed. The EHS Surveyor and/or SME will determine the efficacy of the decontamination process through the clearance assessment/testing.

When a project involves construction, the remediation/mitigation may involve a larger scope of work. Lab equipment and other mobile items are still subject to the remediation/mitigation mentioned above.

Unwanted hazardous materials may not be left in the laboratory, discarded in the regular trash, nor poured down the drain. Detailed disposal information is available on the EHS website.

Additionally, professional services (such as hazardous materials abatement contractors) may be required, especially in cases involving regulated materials (such as asbestos, lead, silica, hazardous wastes, etc.) The Responsible Person(s) should work with EHS staff to create the remediation/mitigation plan.

5.4. Verification

Documents related to assessment/testing and/or remediation/mitigation are collated by the Responsible Person(s) or designee and are submitted to EHS. The documents provide verification that all required actions for decommissioning have met the clearance criteria.

Subsequently, a clearance tag will be issued by EHS to the Responsible Person(s) to signify that the subject item(s) is/are decommissioned. The clearance tag(s) should be affixed to all related items by the Responsible Person(s). UCI staff (Facilities Management generally) are trained to recognize and identify the tag(s) prior to committing their work action(s). <u>Appendix D</u> EHS Clearance Tag shows an example of an EHS clearance tag.

6. Special Procedures

6.1. Fume Hoods

Requests to decommission a fume hood will vary in scope so it is very important to perform a thorough needs-analysis of the request. Some examples of work involving fume hood decommissioning are:

Change the light bulb associated with the fume hood- the location of the light bulb access should be determined. Light bulb access located outside the fume hood may not require a request for clearance assessment/testing. Conversely, light bulb access located inside the fume hood would require clearance assessment/testing.

Repair and/or replacement of the fume hood sash and the associated components- will require lab equipment clearance assessment/testing.

Repair and/or replacement of plumbing lines, associated ductwork, sash stops, and other fume hood components- may or may not require equipment clearance assessment/testing depending on the scope of work. EHS should be consulted to determine the best course of action or submit a request for assessment/testing regardless.

In all cases, fume hood users must cease all work/experiments inside the fume hood until the repairs are completed.

Immediately following the equipment clearance assessment/testing, the EHS Surveyor shall affix a tamper proof tape on the sash-airfoil interface to prevent the use of the fume hood until the repairs are completed.

6.2. Biosafety Cabinets

Requests to decommission a biosafety cabinet will vary in scope so it is very important to perform a thorough needs-analysis of the request. Some examples of work involving biosafety cabinet decommissioning are:

Moving the biosafety cabinet- biosafety cabinets moving within the campus may be decontaminated by the user. The decontaminant may either be 10% bleach solution or 70% ethanol solution; the appropriate contact time for the solution must be observed. The user may also opt to use an NSF 49-certified contractor/vendor to perform the decontamination. In either case, EHS must be apprised of the process so that tamper proof tape can be affixed to the unit after the decontamination procedure. Biosafety cabinets leaving the campus must be decontaminated by an NSF 49-certified contractor/vendor. In this instance, the decontamination certificate issued by the contractor/vendor shall be provided to EHS. EHS will issue a clearance tag after receipt of the decontamination certificate.

Repair and/or replacement of plumbing lines, associated ductwork- may or may not require equipment clearance assessment/testing depending on the scope of work. EHS should be consulted to determine the best course of action, or the user may submit a request for assessment/testing regardless. Change the light bulb, sash stops, repair of the biosafety cabinet sash and other components associated with the biosafety cabinet- any work with biosafety cabinets of similar scope must be performed by an NSF 49-certified contractor/vendor. Clearance assessment/testing will depend on the request from the certified contractor.

In all cases, biosafety cabinet users must cease all work/experiments inside the biosafety cabinet until the work completed.

Immediately following the equipment clearance assessment/testing, the EHS Surveyor shall affix a tamper proof tape on the sash-airfoil/work surface interface to prevent the use of the biosafety cabinet until the work is completed.

6.3 Tamper proof tape

Tamper proof tape is affixed to the sash-airfoil/work surface interface to prevent the use of the fume hood/biosafety cabinet after the EHS surveyor assessment or any decontamination procedure. Removal or tampering with the tape will immediately negate any previous decontamination efforts and render any clearance approval null and void. Such action will result in an obligation to repeat all previous assessment/decontamination procedures.

7. Reporting Requirements

There are instances in the written program above that indicate or imply requirements for reporting.

8. References and Appendices

Appendix A- Sample Checklist for Needs Analysis and Scoping Appendix B- Lab Equipment/Area Assessment/Clearance Testing Flowchart Appendix C- Request for Lab Equipment/Area Testing and/or Decommissioning (Online Form) Appendix D- EHS Clearance Tag

ANSI/AIHA Z9.11-2008 American National Standard for Laboratory Decommissioning

APPENDIX A

Sample Checklist for Needs Analysis and Scoping

Needs Analysis and Scoping Checklist

ITEM	ITEM DESCRIPTION	NOTES	DATE COMPLETED
Designate a Responsible Person(s)	A person or persons designated to be responsible for, or to have oversight over a laboratory or laboratory equipment being decommissioned. Such person(s) can be the Principal Investigators, Facility Managers/Directors, Laboratory Manager/Administrator, research staff, and other stakeholders. The Responsible Person(s) or designee coordinate* or perform preparation activities for items slated for decommissioning. These activities include: 1) Decontamination/cleaning of lab equipment, work surfaces, etc 2) Disposal of hazardous wastes 3) Removal of hazardous materials *The Responsible Person(s) or designee may engage a qualified contractor to accomplish the preparation activities.	Name of Responsible Person(s):	
Determine the Scope	Determine if the project involves: relocation, renovation, localized		
of the Project	construction (demolishing one wall, changing flooring, etc)		
Collect known data	Collect information on how equipment was used, potential contaminants, history of lab use, presence of asbestos/lead etc.		
Perform contaminant assessment and analysis	Visual assessment, sampling and laboratory analysis, etc. are coordinated with the appropriate department.		
Conduct hazard	Hazard abatement, decontamination procedures, etc are performed		
mitigation/remediation	as applicable.		
as warranted			
Instructions: Upon notice that a lab will be decommissioned, all items outlined below must be completed by the affected user. Please contact the Responsible Person(s) to set-up an initial walkthrough to review the checklist and discuss action items. Regular check-ins will be scheduled through completion.			

ITEM	TASK DESCRIPTION	NOTES	DATE COMPLETED	
Stop Access and Usage of Lab Equipment	Discontinue use of equipment to prepare for sanitization & decommission of the lab. This includes environmental rooms, incubators, Biological Safety Cabinets (BSC), chemical fume hoods, etc.	Confirm an end use Date, Responsible Person(s) to hang signage.		
Discontinue	Discontinue services such as water delivery, compressed gas	Confirm cancel dates with		
Services/Deliveries	cylinders, etc. and arrange for a final pick-up of containers. Responsible Person(s)			
Disconnect Lab Phone	Phone Contact OIT - <u>https://www.oit.uci.edu/services/communication-</u> collaboration/telephone/telephone-service-request/			
Request Trash &	Contact Responsible Person(s) to assist with the work order request			
Recycle Bins	to campus FM.			
	EHS DISPOSAL ITEMS			
Chemical Wastes	Arrange for possible disposal of chemical wastes. Contact EH&S.	EH&S Text a Pick-up		
Refrigerator/Freezer	All refrigerators/freezers must be emptied of its contents; the	EH&S Text a Pick-up		
Samples	contents must be disposed of using the appropriate methods.			
	Contact EH&S for guidance.			
Sharps Containers	All sharps waste containers must be sealed. Arrange for proper disposal through EH&S.	EH&S Text a Pick-up		
Solid Biohazardous	All solid biohazardous waste containers must be properly disposed of	EH&S Text a Pick-up		
Waste Containers	through EH&S.			
Broken Glass	All broken glass containers must be disposed of correctly. Clean	Facilities Management		
Containers	broken glass may be placed in a rigid box; arrange for disposal	EH&S Text a Pick-up		
	through Facilities Management. Potentially contaminated broken			
	glass must be placed in the appropriate repository for disposal			
	through EH&S.			
LABORATORY EQUIPMENT				
Biological Safety	Requests to decommission a biosafety cabinet will vary in scope so it	Submit an <u>EHS Request for</u>		
Cabinet (BSC)	is very important to perform a thorough needs-analysis of the	Equipment/Laboratory		
	request. In all cases, biosafety cabinet users must cease all	Clearance		
	work/experiments inside the biosafety cabinet until the work	Testing/Decommissioning		
	completed. Confer with EH&S regarding decontamination			
	requirements.			
	Immediately following the equipment clearance assessment/testing,			
	the EH&S Surveyor shall affix a tamper proof tape on the sash-			

	airfoil/work surface interface to prevent the use of the biosafety		
	cabinet until the work is completed.		
Chemical Fume Hoods	Requests to decommission a fume hood will vary in scope so it is very	Submit an EHS Request for	
	important to perform a thorough needs-analysis of the request. In all	Equipment/Laboratory	
	cases, fume hood users must cease all work/experiments inside the	<u>Clearance</u>	
	fume hood until the work completed. Confer with EH&S regarding	Testing/Decommissioning	
	decontamination requirements.		
	Immediately following the equipment clearance assessment/testing,		
	the EH&S Surveyor shall affix a tamper proof tape on the sash-		
	airfoil/work surface interface to prevent the use of the fume hood		
	until the work is completed.		
Refrigerators/Freezers	All refrigerators and freezers must be unplugged and defrosted.	Submit an <u>EHS Request for</u>	
	Absorbent pads must be used to minimize water puddles. Defrost	Equipment/Laboratory	
	process must be continually monitored to avoid water damage/water	<u>Clearance</u>	
	intrusion event. Refrigerators and freezers must be disinfected with	Testing/Decommissioning	
	an approved disinfectant (typically, freshly-prepared 10% bleach		
	solution, or 70% ethanol).		
	After defrosting and decontamination, submit an EH&S clearance		
	request.		
	E-WASTE		I
All E-Wastes	E-waste MUST NOT be discarded in the regular trash. ALL E-Waste		
	must be arranged for disposal or removal from the space.		
	Contact the Responsible Person(s) with any questions about data or		
	computing equipment.		
	Peter's Exchange can be utilized for E-Waste FREE Pick-Up.		
	Label all items for Peter's Exchange and fill out Peter's Exchange Pick-		
	Up Form.		
	Label all E-waste as "Universal Waste - CRT" or "Universal Waste –		
	Electronic Waste" and include the date when the waste was first		
	generated. E-Waste must be transferred to Equipment Management -		
	Peter's Exchange for recycling within 9 months of being generated.		
	PERSONAL ITEMS		1
All Personal Items	Lab personnel must remove all personal items, and observe the		
	appropriate document hygiene (shredding, archiving, etc). Contact		
	the Responsible Person(s) for guidance.		

RADIOACTIVE EQUIPMENT AND MATERIALS				
All Radioactive	All radioactive equipment must be properly cleaned by the user.			
Equipment	Contact the EH&S Radiation Safety at radwaste@uci.edu to begin the			
	clearance process. This must be done if the equipment is moving or			
	no longer needed.			
All Radioactive	All radioactive waste must be picked-up by RAD. Fill out the pick-up	Submit an <u>EH&S Radioactive</u>		
Materials and Wastes	request form. Contact EH&S with any questions.	Waste Disposal Request		
	RECYCLING			
All Recyclable Items	All recyclable waste inside the lab must be disposed of in a recycle			
	bin accordingly. Request assistance from the Responsible Person(s) as			
	needed.			
	Be sure all items are clean and dry & all cardboard boxes have been			
	flattened.			
	SURPLUS EQUIPMENT/FURNITURE/OTHER ITEM	S		
ALL surplus equipment,	ALL surplus equipment, furniture, and other items must be arranged	Peter's Exchange		
furniture, and other	for disposal or removal from the space.			
items	Peter's Exchange can be utilized for surplus & E-Waste FREE Pick-Up.			
	Label all items for Peter's Exchange and fill out Peter's Exchange Pick-			
	Up Form.			
	TRASH			
Glassware	Place glassware in a cardboard box and place in the trash. Consult with			
	Peter's exchange regarding usable glassware.			
FINAL STEPS				
Disinfect All Surfaces	A final disinfectant wipedown of all lab surfaces including benchtops,			
	countertops, faucets, sinks and shelves must be completed. Use an			
	approved disinfectant (typically, freshly-prepared 10% bleach			
	solution, or 70% ethanol).			
Notify the Responsible	Notify the Responsible Person(s) of after completing the tasks for a			
Person(s) of	final walkthrough of the area.			
Completion				

APPENDIX B

Lab Equipment/Area Assessment/Clearance Testing Process (Flowchart)



APPENDIX C

Request for Equipment/Laboratory Clearance Testing and/or Decommissioning (Online Form)

Request for Equipment/Laboratory Clearance Testing/Decommissioning

The purpose of the clearance testing/decommissioning procedures is to minimize the potential health and safety risk to : • the public (movers, salvage equipment buyers, etc.) who may have direct contact with items being decommission ed; • the environment; • personnel involved with the renovation/demolition/construction; • future users and occupants.

Prior to clearance testing, all accessible surfaces must be free of contamination. (I biological agents have been in contact with the equipment and/or surface(s), disinfect (e.g., a 10% bleach solution freshly made). If radioactive materials are or have been used, decontaminate the surface/item or contact the RSO at LH&S. Contact EH&S if you need additional information about proper disinfection procedures.

	B
Clearance	Needed By *
Please allo	w a minimum of 48 hours for a response.
Requester	*
Email *	
Phone *	
Principal Ir	ivestigator *
Departmen	t *
Build in g *	
Select	
Room(s) *	
Clearance	Type *
Clearance Whole Purpose of	Type * Lab Clearance/Decommissioning
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Clearance Whole	Type * Lab Clearance/Decommissioning
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Clearance Whole Purpose of Please indi (such as se more) * Check if ap Check if ap Check if ap ontain below.	Type * Lab Clearance/Decommissioning C Equipment Clearance is Clearance * vidually list the equipment needing clearance and its associated identifi rial number, UCI Property Number, etc. Limit of FIVE entries - see below plicable mober of equipment exceeds the available field above, please upload a l ing all the requested information (as above) in the 'File Upload' section al / Chemical / Radioactive Material Status be statement must be checked 'Vee' of if the statement is not available
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Clearance* Whole Plarpose of States ind (such as ses (such as ses ind the me ontain below. Biologicic Www. Biologicic Www. Biologicic Www. Biologicic Www. Biologicic Www. Biologic States Biologic Biol	Type * Lab Clearance/Decommissioning C Equipment Clearance : Clearance * vidually list the equipment needing clearance and its associated identifi rial number, UCI Property Number, etc. Limit of FIVE entries - see below plicable uplicable al / Chemical / Radioactive Material Status se statements must be checked "Yes", or if the statement is not applicable we dail cultures and stocks of microorganisms and regulated medical the premises. * N/A

⊖Yes ⊖N/A

removed no	s, centrifuges, water baths, GC, HPLC, incubators etc.) that will be m the laboratory. *
🔿 Yes	○ N/A
I/We remove	ed chemicals requiring disposal as hazardous waste. *
⊖ Yes	○ N/A
I/We guaran	tee that all benches have been cleaned and decontaminated. \star
⊖ Yes	○ N⁄A
I/We guaran	tee that the fume hood has been cleaned and decontaminated. \star
⊖ Yes	○ N/A
Biosafety	/ Cabinet Clearance Request
Please choo	se ONE of the following options:
This option contractor/v	does NOT require decontamination by an NSF 49-certified endor. Nonetheless, cleaning and decontamination must still be performed.
Relocatio	on and Reuse within UCI campus grounds
Salvage	or Disposal
File Upload	
File Upload	Drag and drop files here or browse files
File Upload	Drag and drop files here or browse files
File Upload Comments Please notificlosed syste I hereby	Drag and drop files here or browse files or Additional Information for EH&S y EH&S of possible contamination in drain systems, vacuum and similar ms that may contain hazardous materials.
File Upload Comments of Please notifi closed syste I hereby knowled	Drag and drop files here or browse files or Additional Information for EH&S VEH&S of possible contamination in drain systems, vacuum and similar ms that may contain hazard-cus materials. affirm that the information given is true and correct to the best of my ge and belief. *
File Upload Comments of Please notifi closed syste I hereby knowled Send me a	Drag and drop files here or browse files or Additional Information for EH&S y EH&S of possible contamination in drain systems, vacuum and similar ms that may contain hazard cus materials. affirm that the information given is true and correct to the best of my ge and belief. *
File Upload Comments o Please notifi Closed syste I hereby knowled Send me a Submit	Drag and drop files here or browse files or Additional Information for EH&S y EH&S of possible contamination in drain systems, vacuum and similar mas that may contain hazardrus materials. affirm that the information given is true and correct to the best of my ge and belief. *
File Upload	Drag and drop files here or browse files or Additional Information for EH&S PEH&S of possible contamination in drain systems, vacuum and similar with that the information given is true and correct to the best of my ge and belief. *

APPENDIX D

EHS Clearance Tag

EH&S SITE VISIT NOTIFICATION AND CLEARANCE APPROVAL Industrial Hygiene Section

Site Location/ID:	

Purpose of Visit:

Inspection/Assessment
Air Monitoring/Sampling
Equipment Clearance (<i>List Equipment Name and ID</i>)
Other

Assessment Result:

PASS	FAIL

For Laboratory/Equipment Clearances-Cleared for:

□рН	Peroxides
Perchlorates	Radiologicals
Biohazards	Other:
Biohazards	Other:

Narrative/Required Action(s):

- OK to proceed with work or move.
 *NOTE: clearance approval expires 30 calendar days from date of issue.
- U Wear appropriate personal protective equipment when performing work.
- D Problem reported; use may continue.
- D Problem reported.

Date*:	Time:
EH&S Personnel:	
Contact Information:	

EH&S Industrial Hygiene Approval



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