LABORATORY DECOMMISSIONING & RELOCATION GUIDELINES

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II. <u>At-A-Glance</u>

- The Laboratory Principal Investigator (PI), associated personnel and department are responsible to complete safety and regulatory requirements before a laboratory can be decommissioned or relocated. This guide outlines necessary steps to minimize downtime in research and ensure the health and well-being of the campus community.
- For a small-scale project: 60 days before a small-scale laboratory decommissioning, lab staff must complete a Lab Closing/Relocation Form. For a large-scale project: at least 5 months in advance of the projected move date, the Office of Space Planning & Management will coordinate with key stakeholders of a large- scale laboratory decommissioning and relocation.
- For the purposes of this document, a small-scale lab closing/relocation involves a single PI or research group. A large-scale move or closing involves multiple PIs or research groups and/or entire departments or buildings and is almost always associated with a capital construction or renovation project.
- Departments involved in large-scale laboratory moves or decommissioning projects must identify a primary point of contact to coordinate the laboratory decommissioning process and are strongly encouraged to establish a departmental move working group to support the primary contact.
- All lab materials and equipment must be properly managed by the PI and/or associated personnel including decontamination, cleaning, requests for risk assessment and moves, updates to research protocols, regulatory permits to transport or dispose of materials, and proper disposal of hazardous and non-hazardous materials.
- The UGA Laboratory Decommissioning and Relocation Committee is committed to assist departments through safe and timely processes to limit downtime in research. Detailed information is provided in this guide. This process will be updated as needed based on feedback, outcomes, and experiences with laboratory decommissioning and relocation projects.

III. Key Contacts

DEPARTMENT	ROLE	PHONE	EMAIL
<u>Biosafety</u>	Provide risk assessment for biosafety cabinets' relocation; provides guidance for laboratory decontamination and disposal of biohazardous waste; provides training to personnel that transport biohazardous materials.	706-542-7265	<u>biosfty@uga.edu</u>
Radiation Safety	Dispose of radioactive waste upon request.	706-542-0107	<u>radiation-</u> <u>safety@uga.edu</u>
Research Safety	Receive Laboratory Closing/Relocation Forms for small scale changes and consult with PIs on chemical inventories / transfers.	706-542-9088	researchsafety@uga.edu
Environmental Safety	Dispose hazardous waste upon request.	706-542-5801	<u>hazmat@uga.edu</u>
FMD Support	Provide consultation for upcoming	706-542-6742	kevindw@uga.edu
Services	moves and transport laboratory	706-542-7582	<u>Jcdemp@uga.edu</u>
	equipment.	706-542-5129	randye1@uga.edu
<u>Asset</u> <u>Management</u>	Provide support and guidance on UGA and Georgia DOAS surplus property policy and procedures.	706-542-4390	surplus@uga.edu
<u>Green Labs</u> <u>Program</u>	Facilitate reuse, recycling, or donation of unwanted lab materials.	706-542-7884	greenlab@uga.edu
<u>University</u> <u>Architects</u>	OUA manages planning, design, construction, and renovation of capital facilities.	706-542-3605	<u>facilitiesinquiries@uga.</u> <u>edu</u>
Office of Space Planning & Management	OSPM is the point of contact between OUA and other departments to coordinate departmental moves and will coordinate with all listed departments of large-scale laboratory changes.	706-583-3880	<u>spacerequests@uga.edu</u>
<u>Waste</u> <u>Reduction</u> <u>Services</u>	Support removal of waste materials from campus and waste reduction initiatives.	706-542-1301	waste- reduction@uga.edu

IV. <u>Purpose</u>

This policy provides direction and guidance for proper decommissioning of a laboratory for the purposes of lab closure, relocation, or renovation. Outlined below are the safety and regulatory requirements that must be met by laboratory personnel before the principal investigator (PI) can be relieved of the responsibility for their space by the Office of Research Safety (ORS). Failure to complete any of these steps can lead to delays in the decommissioning process.

V. <u>Timelines/Checklists</u>

Small-scale laboratory decommissioning generally requires 60 days. Large-scale laboratory

decommissioning generally requires a minimum 5 months; details are included in the UGA Laboratory Move Timeline (Swim Lane Diagram). Once the Lab Opening/Moving Form has been submitted and reviewed for small-scale changes, a checklist with information on your timeline(s) will be provided to you based on the specifics of your decommissioning and relocation needs. For large-scale moves, OSPM will provide the checklist and timeline information to the primary point of contact and any working group(s). Submittal of the Lab Opening/Moving Form remains the responsibility of each PI associated with the move.

The UGA Laboratory Decommissioning and Relocation Committee is committed to assist departments through safe and timely processes to limit downtime in research.

VI. <u>Accountability</u>

The University of Georgia is committed to health, safety, environmental protection and compliance based on current government regulations, guidelines, and best practices. This document has been developed to assist all personnel involved in the decommissioning or relocation of a laboratory by detailing the responsibilities of all parties. The decommissioning of laboratories can range in scope from single-laboratory decommissions or relocations to department-wide or building-wide projects. This document is written to encompass small-scale laboratory moves while also providing appropriate guidance for large-scale moves.

The decommissioning of laboratories and the movement of laboratory equipment and materials requires collaboration between laboratory staff, Asset Management, Environmental Safety Division, Facilities Management Division, Office of Research, University Architects, Office of Space Planning & Management and external contractors. This document describes the steps that must be taken by each responsible party to facilitate laboratory decommissioning.

VII. Roles and Responsibilities

Home Departments involved in a Laboratory Decommissioning or Relocation are responsible to:

- For a large-scale move or decommissioning, assign primary point of contact to coordinate the move, including coordination with external vendors such as for sharps collection or decontamination of biosafety cabinets. For small-scale moves, the PI will be assumed to be the primary point of contact.
- Establish a departmental or building-level working group comprised of representatives from each unit involved in the move in order to support the primary point of contact for large-scale relocations.
- Ensure all PI & Laboratory Personnel tasks listed below are completed in a thorough and timely manner to minimize impact to research functions. If a PI leaves without notice or experiences an emergency rendering them incapable of completing their responsibilities, then those responsibilities default to the Department Head or their designee.

PI & Laboratory Personnel are responsible to:

- For small-scale moves, inform the Office of Research Safety of the intention to move via the Lab Opening/Closing/Relocation Form. For large-scale moves, this notification will be managed by the Office of Space Planning & Management.
- Make arrangements for the transportation or removal of laboratory equipment.
- Appropriately decontaminate all laboratory equipment and surfaces.
- Dispose of all non-hazardous and hazardous waste and ensure that the laboratory space is clean.
 - 1. Make arrangements with Waste Reduction Services for recycling and other waste diversion opportunities.

- 2. Schedule with UGA Green Labs to rehome unwanted lab glass and consumables still in good condition.
- 3. Place trash and other unusable materials into the landfill dumpster.
- Update any research compliance protocols with relevant information.
- Ensure that all applicable permits are in place if needed.
- If a laboratory fails to complete all of the necessary tasks by assigned deadlines, oversight and support groups listed below would step in to ensure that the move or decommissioning happens on schedule. In these cases, the lab's department will be charged for these services.

UGA Laboratory Decommissioning and Relocation Committee is responsible to:

• Meet as needed to coordinate large-scale moves and decommissions, review laboratory moving guidelines and outcomes, and update guidelines as needed to improve the decommissioning and relocation process.

Office of Research Safety is responsible to:

• Consult with relevant departments upon receipt of Laboratory Closing/Relocation Forms, ensuring that chemical inventories are accurate, coordinating transfers of chemicals, officially removing a PI from responsibility for a space, and listing a new lab as being under the responsibility of a particular PI.

Office of Biosafety is responsible to:

• Provide risk assessment for the relocation of biosafety cabinets (BSCs), provide guidance for appropriate laboratory decontamination and disposal of biohazardous waste, provide training to personnel that must transport biohazardous materials, and ensure that laboratories are free of biohazardous material prior to formal decommissioning.

Office of Radiation Safety is responsible to:

• Provide radioactive waste disposal services upon request. Remove sealed sources when necessary and assist with the relocation of lasers.

Environmental Safety Division is responsible to:

• Pick up hazardous waste upon request. Evaluate waste chemicals in the laboratory to determine the appropriate waste streams for each item.

FMD Support Services is responsible to:

• Provide consultation for upcoming moves, coordinate the rental or use of certain supplies such as moving totes, tables, chairs, etc. Provide transport of certain laboratory equipment items and moving totes.

FMD Green Labs Program is responsible to:

• Provide consultation on materials that can be reused or recycled and facilitate donation of unwanted lab materials.

FMD Waste Reduction Services is responsible to:

• Support the removal of waste materials from campus and waste reduction initiatives.

Office of University Architects

• OUA manages planning, design, construction, and renovation of capital facilities.

Office of Space Management is responsible to:

• Office of Space Planning & Management is the point of contact between OUA and the users to

coordinate departmental moves and will notify all listed departments of large-scale laboratory changes.

Asset Management is responsible for providing support and guidance to ensure proper disposal of state surplus property. Coordinate with the Georgia Department of Administrative Services Surplus Division to obtain the appropriate disposal method and authorization.

VIII. Laboratory Decommissioning Policies

A. Lab Closing/Relocation Form

For a small-scale laboratory move or decommissioning, the PI or their designee must complete the online Laboratory Closing/Relocation Form as early as is reasonably possible. This not only informs the Office of Research Safety (ORS) of your intentions, but also allows ORS the opportunity to consult with other offices that need to be involved in the lab decommissioning. Small-scale lab decommissioning and relocations should be submitted 60 days prior to the planned date of decommissioning and/or relocation. The Office of Space Planning & Management will provide notification of large-scale departmental decommissioning and relocations at least 5 months prior to the projected move date.

B. General Requirements

Moving support staff must not enter the lab without a laboratory representative present.

If the PI has active research protocols with any research safety committees, the PI is responsible for submitting amendments/modifications to update research locations and other information that may change due to the decommissioning or relocation. These committees may include the Institutional Animal Care and Use Committee, Institutional Biosafety Committee, and/or others.

If the PI has regulatory permits in place, the PI is responsible for ensuring all permit requirements are met regarding transportation and/or disposal of materials. The PI is further responsible for updating the regulatory entities with their research locations and other relevant information.

C. Laboratory Equipment

- All laboratory equipment must be removed from the lab. Any equipment and materials left behind will be the responsibility of the department. Departments should utilize the <u>Surplus</u> <u>Marketplace</u> to assist in redistributing unneeded equipment internally within UGA. If a laboratory space is to be renovated or demolished, all equipment must be relocated to other laboratories or storage areas not within the scope of the renovation or demolition. No equipment is allowed to be left in a space that is within the scope of a renovation or demolition. The PI and department must follow <u>UGA surplus procedures</u> for any equipment that will not be kept or moved. The timeline of removal and/or disposal of items intended for surplus is determined by the amount of equipment and the approved disposal method from the <u>Georgia Department of Administrative Services Surplus Division</u> (note: <u>UGA Asset</u> <u>Management</u> can assist with this process).
- All laboratory equipment must be clearly identified as either moving to a new space or intended for disposal or surplus.
- All laboratory equipment must be decontaminated in accordance with the <u>Laboratory</u> <u>Equipment Decontamination SOP</u> prior to being removed from the lab. Once the equipment has been decontaminated with an appropriate disinfectant, a <u>decontamination tag</u> must be completed and attached to each piece of equipment. The equipment must be decontaminated

AND cleaned prior to being moved. Please note that some pieces of equipment such as biosafety cabinets and liquid scintillation counters may require outside vendors to provide appropriate decontamination services.

- The <u>Office of Biosafety</u> must be consulted to provide a risk assessment prior to the move of any biosafety cabinet. The requirements for moving a BSC will vary depending on the nature of both the move itself and the biohazards used inside the BSC.
- The transportation of laboratory equipment (either to a new lab location or to UGA Surplus Property) must be scheduled and arranged with FMD Support Services by completing a <u>Work</u> <u>Request</u>. Note that a <u>Surplus Equipment Transfer Form</u> will need to be filled out before items can be picked up. Not all surplus items can be moved to the Surplus Warehouse. Please coordinate with Surplus Property on large scale surplus activities months in advance of any lab closures or moves. For large scale moves, the Office of Space Management will submit the work request to FMD Support Services.
- Gas cylinders must have regulators removed, safety caps replaced, and either be relocated to the new laboratory or picked up by the compressed gases vendor. ESD will assist with the relocation of gas cylinders to new laboratory locations. Gas cylinders must be tagged as full, in-use, or empty.
- Refrigerators, freezers, and cold rooms must be emptied, cleaned, and decontaminated. If any samples are being left behind for use by another research group, these samples must be clearly labeled to indicate their contents and the name of the person who will be responsible for them. Labeling these sample containers with just initials or sample ID numbers is not acceptable.
- Refrigerators, -20° freezers, and -80° freezers that are not emptied can be moved if all the following requirements are met:
 - Everything within the freezer is secured. No loose items in the freezer.
 - Tape (e.g. duct tape) must be placed around the seal of the freezer door.
 - The freezer door must be locked with a keyed or combination padlock.
 - Two wide moving straps must be placed and tightly secured around the freezer (one at the top, one at the bottom).
 - A <u>UGA Decontamination Tag</u> indicating the outside of the freezer was decontaminated, as well as freezer identification (PI's name) on the front of the freezer is required. A biohazard sticker should also be visible on the freezer.
 - There must be a large Ziplock bag containing an itemized inventory of the freezer contents taped to the freezer. Any applicable transport permits will need to be included with the inventory.
 - Movers should use a truck with an automated lift. A truck with a generator and outlets to move these freezers should also be used if possible.
 - Movers must be certain freezers are appropriately secured prior to transport.
 - The movement of freezers containing infectious agents will require escort by a certified shipper who must have a biological spill kit readily available.

Glassware must be cleaned and disposed of or relocated to other laboratories not within the scope of the renovation. Some laboratory glassware, consumables and other non-inventoried items may be eligible for UGA's <u>Lab Glass Rehoming Program</u> – a program by which usable laboratory items are diverted from waste streams to the Athens-Clarke County Teacher Reuse Store for area schools. The <u>Green Labs Program</u> can help facilitate this process. Please provide at least a three week notice for small-scale lab moves and 3-4 months notice for large-scale moves to the Green Labs Program to receive the greatest benefit.

D. Disposal or Transport of Hazardous materials

1. Biohazards- Disposal

All biohazardous waste must be autoclaved on the appropriate waste decontamination cycle and disposed of, or it may be picked up by an approved biomedical waste vendor such as Stericycle or MCF. Any liquid biohazardous waste must be decontaminated with an appropriate disinfectant prior to disposal. *Biohazard autoclave logs are required to be retained for three years; any lab-specific autoclave logs must be retained by the department once the lab is no longer with the university.*

Sharps containers must be picked up from the lab by an approved vendor. Biomedical waste vendors such as Stericycle or MCF typically offer these services. If the laboratory generating the sharps has a BSL-1 containment level and only has a small amount of sharps (one container maximum), UGA <u>Environmental Safety Division</u> may provide pickup services.

2. Biohazards- Transport

Any biohazardous materials transported between laboratories or buildings on UGA's campus must be appropriately contained to prevent release of these materials. Materials must be in closed primary containers, and these containers must be wrapped with tape or parafilm to further prevent leakage. These primary containers must be placed into closed secondary containers (such as Ziplock bags or small Sterilite bins with lids), and these secondary containers must contain enough absorbent material to contain the total volume of biohazardous material in the event of a leak. This secondary container must then be placed into a closed, puncture-resistant, leak-proof tertiary container (such as a large Sterilite/other tote bin). This tertiary container must be labeled with biohazard labels and the identity of the biohazardous material inside. The container should be secure during transport and must not be hand-carried. Biohazardous stickers are available from the Office of Biosafety upon request.

All biohazardous materials that are to be transported on a public roadway and/or are classified as Category A or B are required to be packaged according to <u>IATA/DOT</u> regulations. These materials must be properly classified, packaged, documented, and handled by trained personnel. The UGA <u>Office of Biosafety</u> can provide this training upon request. The PI/lab is responsible for determining whether their biohazardous materials fit into either of these categories and then completing shipper's declarations and intracampus transport forms as required. State/university vehicles must be used for these transports. Use of personal vehicles is not permitted. <u>Contact FMD Support Services</u> to

arrange rental of a vehicle if needed.

Special federal permits may be required for transporting human pathogens, animal pathogens, animals or animal products, plant pathogens or plant pests, and plants or plant products. Permit requirements should be verified well in advance of planned relocations. In general, the receiver is required to be approved and hold a permit for the material before it is shipped or moved. The PI is responsible for ensuring that all permits from regulatory entities (such as USDA/APHIS or CDC) are up to date as well as complying with the conditions of these permits.

Transport of any Select Agent or Toxin between laboratories or buildings on campus requires CDC approval for possession, storage, or transport to any location. Records of the amounts and locations of these agents are required to be kept. As of February 2003, the CDC and USDA regulations regarding Select Agents (42 CFR Part 73, 7 CFR Part 331 and 9 CFR Part 121) supersede any previous regulations. Substantial criminal penalties apply to both individuals and organizations that do not comply with the regulatory requirements. Select Agents or Toxins may NOT be transported without coordination of the campus RO or ARO and registered PIs.

3. Chemicals – Inventory Transfer and Physical Transport

Before any unwanted chemical containers are transferred to another researcher, contact the Office of Research Safety to ensure inventory accuracy and continuity *before* any containers are physically transported to another laboratory. Guidance will vary depending on the type and quantity of chemical containers subject to transfer.

Chemicals being transported to other spaces must be packaged in sturdy, compatible containers with absorbent pads or absorbent materials in the case of liquids. If hazardous chemicals are being transported within a building or to an adjacent building, laboratory staff may complete these moves. This may be done by lab staff using a hand-truck or cart. Special care must be taken not to package incompatible materials together (e.g. oxidizers with flammables, acids with bases). If there are items needing to be transported to an offsite location or to a non-adjacent campus building, please contact the Office of Research Safety or Environmental Safety Division to coordinate the transport.

4. Chemicals and Hazardous waste – Disposal

Pickup, transport, and disposal of chemical waste must be arranged through the Environmental Safety Division's <u>Hazardous Materials Program</u>. Regulated chemical waste includes waste generated during routine lab operations, experiments, research, analysis, and other processes as well as chemicals/reagents in original manufacturer's containers that the Principal Investigator plans to leave behind.

For more information about transferring unwanted chemicals to other researchers, contact the Office of Research Safety before starting any waste or transfer activities. Specific guidance will vary depending on the types and quantities of chemicals and waste that are subject to transfer or disposal. These include any hazardous waste

streams generated by the lab during normal operations as well as any hazardous chemicals/reagents that the PI is planning to leave behind.

5. Radioactive materials- transport

Radioisotopes or contaminated equipment may be transferred from one Authorized User to another instead of becoming waste. <u>Radiation Safety</u> must be contacted prior to initiating a transfer. The PI is responsible for ensuring conditions of radioactive material permits are met for transport and the permit is updated as needed.

6. Radioactive materials- disposal

Any radioactive waste must be disposed of through the <u>Office of Radiation Safety</u>. If a lab has a piece of equipment destined for property surplus with a sealed radioactive component, that component must be removed by the Office of Radiation Safety prior to the equipment being sent to surplus.

7. Miscellaneous materials

Glass disposal boxes must be sealed shut and taken to the nearest dumpster by laboratory staff.

Autoclave logs for biohazardous waste must be retained by the department in accordance with state regulations if a laboratory is being decommissioned. The State of Georgia requires that all autoclave logs for biohazardous waste be kept for 3 years.

IX. Laboratory Cleaning Requirements

All laboratory surfaces must be cleaned. If hazardous materials were utilized in the lab, all surfaces must also be decontaminated with an appropriate disinfectant.

Benchtops, drawers, and floors must be free of any laboratory debris (including general litter and unused consumables such as gloves, tubes, or pipette tips). All laboratories are responsible for ensuring that these materials are cleaned out of the space prior to decommissioning. The laboratory may not be formally decommissioned until these materials have been removed.

In the event that a laboratory is not decommissioned appropriately, the lab will be considered abandoned and initiate the flowchart found on the following page. ORS will provide a letter and invoice to the department detailing the actions needing to be taken in order to close the lab. If the lab is not closed within 60 days, ORS will step in and close the laboratory, charging the department the amount stated in the invoice provided.



Office of Research ABANDONED LAB CLOSURE PROCESS

<u>NOTIFICATION:</u> Unit Representative notifies ORS by submitting a <u>lab closing/</u> <u>relocation form</u> or emailing researchsafety@uga.edu

DEFINE:

Unit Representative assigns a point of contact (POC) for the lab closure process or designates themselves as the POC.

DEADLINE: ORS sends a letter to the POC along with an invoice detailing the cost of the lab closure if ORS takes control of the closure process.

ORS TAKES ACTION:

If no action is taken by the department within 60 days, ORS will start the lab closeout and charge the department based on the invoice provided. DEPARTMENT TAKES ACTION: Department closes the lab within 60 days based on ORS lab closure process.

Lab Released for new occupant/renovation.