

Guidance for Laboratory Closure

This guidance material is intended to inform the University of Arizona laboratory workers on the expectations and requirements for closing or otherwise inactivating laboratory space(s) at any UArizona facility. It is imperative to inform RLSS and other UArizona compliance entities (e.g. Risk Management Services, Export Control, etc.) as soon as possible to ensure the compliant and safe decommissioning, transfer, and/or disposal of hazardous materials in your laboratory.

Common situations resulting in a laboratory closure are:

- Transfer to new institution;
- Retirement and lack of funding;
- Transfer/collaboration with another researcher;
- Partial closure (construction, renovation, temporary, etc).
- Preparation for new occupants in former laboratory spaces.

Summary of Laboratory Closure Process

1. Notification of Closure:

Notify RLSS as soon as possible by emailing <u>RLSS-help@arizona.edu</u>; provide laboratory spaces and contact information.

2. Preparing for Laboratory Closure:

Prepare your staff, equipment, and inventory of hazardous materials for disposal and/or transfer.

3. Completing the Laboratory Closure Checklist:

The checklist (pg 3-4), and all applicable actions, must be completed before the closure can be official. Contact RLSS once completed for a final walkthrough of the laboratory and sign off on the checklist. This will be kept in RLSS records and can be shared with the department, building manager, etc.

4. Closure Completed.

1. Notification of Closure

Researchers must notify their department administration, building manager, and RLSS of laboratory closure plans <u>as soon as possible</u>. RLSS is better postured to assist in coordinating resources and ensuring compliant disposal, transfer, and/or decommissioning of hazardous materials, facilities and equipment when informed well in advance.



To formally initiate the closure process, please email RLSS (<u>RLSS-help@arizona.edu</u>) with the following information:

- PI Name, Department, and the location(s) that are being closed;
- Reason for closure (e.g. moving to new institution, retirement, etc.);
- Anticipated date of closure (last day in the space(s)).

Once you have contacted RLSS to inform them of the closure, you will be asked to schedule a closure consultation (digital or in-person options are available). At this consultation, RLSS will discuss the closure process and requirements to be met prior to being officially closed.

2. Preparing the Laboratory for Closure

Before beginning laboratory closure operations, laboratory workers should:

- Determine if there are special requirements or practices to be followed in order to safely ramp down research, shut down any critical equipment, prepare laboratory materials and equipment for a transfer or surplus, etc.
 - Ensure lab personnel involved in the closure process are aware of these special requirements and properly trained in how to mitigate their risks.
 - Take extra precautions to ensure licensed and/or registered materials, such as radioisotopes or DEA controlled substances, are handled in a safe and compliant manner.
- Inventory critical research equipment and hazardous materials.
- Ensure emergency equipment (e.g. spill kits, first aid kits, etc.) is available for lab personnel at the time of the closure in the event of unplanned releases of hazardous materials.
- Give advanced notice to Risk Management Hazardous Waste Dept (RMS) for any hazardous waste pickup request. Pickup requests can take 2 days to 3 weeks depending on the waste volume.

During laboratory closure, laboratory workers should:

- Separate equipment and hazardous materials that will be disposed from those that may be transferred to new locations and/or laboratories (if applicable).
- Conduct a final tour of laboratory with RLSS to confirm completion of the Laboratory Closure Checklist.
- Lock all relinquished lab spaces once closeout procedure has been completed.



3. Complete Laboratory Closure Checklist

Laboratory Closeout Checklist

Laboratory Closeout Item	Researcher Review			Follow Up Review		
	Yes	No	N/A	Yes	No	N/A
General Laboratory						
Department administration, building manager, and RLSS have been informed of the closure.						
RLSS has been consulted for closure questions, concerns, and assistance.						
Unwanted or broken equipment (e.g. refrigerators, freezers, incubators, centrifuges, vacuum pumps, etc.) has been discarded through UA Surplus.						
Instruments, supplies, and equipment (e.g. refrigerators, freezers, incubators, centrifuges, vacuum pumps, etc.) has been cleaned and disinfected, as needed.						
Report any laboratory equipment (e.g. fume hoods, biosafety cabinets, etc.) not performing as intended for maintenance (Contact Facilities Management at 520-621-3000).						
Hazardous materials inventories have been updated and provided to relevant parties (shipping vendor, RLSS, collaborators, etc.).						
Hazardous materials (biological, chemical, radiological) have been properly prepared for disposal and arrange a waste pick- up time.						
A lab "fire sale" or transfer of materials (i.e. chemicals, glassware, and lab supplies) that will not be moved to a new location has been completed.						
Areas beneath hoods, in shared labs and equipment, and in freezers, refrigerators, cold rooms, and/or bench drawers have been checked for biological, chemical, or radioactive materials that might be left behind.						
All surfaces and equipment in the lab(s) have been disinfected, cleaned, or decontaminated to assure that no biological, chemical, or radioactive contamination remains.						
Requested RLSS removal of hazard communication postings (e.g. emergency contacts, hazards postings, designated area stickers, etc.) from rooms.						
Radioactive and Laser Approval	1			0		
RLSS has been notified for radiation and laser specific closure items.						
RAM/Laser inventory have been reviewed and updated to account for relinquished materials or cleared entirely.						



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		Researcher Review			Follow Up Review		
Laboratory Closeout Item	Yes	No	N/A	Yes	No	N/A	
Radioactive and Laser Approval							
Requested RLSS removal of instruments, radiation waste,							
hazardous communication postings (e.g. Worker Protection							
Notice, hazard postings, laser labels, etc.).							
Are any radioactive materials to be transferred to other units							
IN UArizona?							
Are any radioactive materials to be transferred to institutions							
or locations OUTSIDE of UArizona?							
Tagged radiation waste with RLSS waste tags and required							
information.							
RLSS has performed the Final Lab Survey.							
Biological and Plant Approval							
Biological agents have been removed from storage and							
disposed of according to SOPs.							
Chemical Approval		T	T	0	-		
Removed chemicals from storage. Discarded any empty							
chemical containers.							
All solid chemicals with original labels have been placed into							
boxes no larger than 12x12x12.							
Consolidated liquid chemicals in their original containers into							
one area of the lab. (Do NOT box)							
Lecture bottles and/or hazardous gases have been disposed of	_	_	_	_		_	
appropriately; hazardous gases must not be transferred to a							
new laboratory without RLSS assessment and approval.							
A vendor has been consulted and assisted in							
shipping/transporting hazardous chemicals to their new							
location. (NOTE: Do not ship yourself, as you must have							
documented training to ship hazardous chemicals; for							
segregation of chemicals prior to meeting with a vendor; refer							
to the <u>RLSS Chemical Storage and Segregation Guideline</u>). Chemicals without labels or unclearly labeled that will							
remain have been properly labeled with a GHS-compliant							
label.							
Transfer of registered and/or licensed materials (e.g. DEA							
controlled substances, ATF explosives, etc.) to new							
institution was completed with agents from the							
regulating/licensing agency (NOTE: DEA controlled							
substances can be transferred to another research in limited							
circumstances; please contact RLSS for assistance).							
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	Researcher Review			Follow Up Review			
Laboratory Closeout Item	Yes	No	N/A	Yes	No	N/A	
Chemical Approval							



Tagged secondary chemical containers with a designated RMS waste tag. Any unknown chemical mixtures have been marked as "Unknown"			
All unwanted and/or expired DEA controlled substances have been disposed of through Risk Management Services or other reverse distributor.			
Lecture bottles and/or hazardous gases have been disposed of appropriately; hazardous gases must not be transferred to a new laboratory without RLSS assessment and approval.			
Mercury and mercury containing equipment, including mercury thermometers have been disposed of through Risk Management Services.			
Expired and/or old chemicals that may be unstable, such as peroxide formers, have been disposed of through Risk Management Services.			
All gas valves/lines have been closed, cylinders have been capped, and stored or removed appropriately by UArizona Cryogenics.			
Gas cylinders that remain have been marked, "Empty," "Full," or "In Use."			
Final walkthrough of the space has been performed and RLSS approves of the closure.			