

Hazardous Materials Assessment of Equipment Recommended For Disposal

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1.0 Purpose and Applicability

Any equipment offered for disposal may contain a variety of materials that if disposed of could be hazardous to people or the environment.

In recognition of this potential to cause harm this policy makes every attempt to minimize as much as possible the impact of improper disposal of hazardous materials.

To address these potential disposal problems, the Environmental Health & Safety Department (EH&S) has developed this equipment disposal review process. The intent of the process is to involve various environmental disciplines in a review of any equipment disposal to assess the potential that this equipment may have, to contain hazardous components. The goal would be to remove these potential hazardous components prior to recycling or disposal.

2.0 Definitions

- 2.1 SED Surplus Equipment Disposal & Transfer Form
- 2.2 EMPAC Enterprise Maintenance, Planning & Control work management system
- 2.3 AHR All Hazards Review
- 2.4 "Hazardous Materials" This could include surface contamination on equipment, components installed in or on the equipment by the manufacturer or others, laboratory components accidentally left on or in the equipment. Hazardous could refer to chemical, biological, or radioactive material or contamination.
- 2.5 1 "Equipment" refers to a wide array of components that are commercially available or custom made for laboratory, teaching or research. These could include simple consumer items such as refrigerators, and ovens, and could extend to one of a kind custom made apparatus specifically manufactured for a research project.
- 2.6 Asbestos review
- 2.7 "Decontamination" is a process in which any potential contamination on the exterior or interior of equipment has been removed.
- 2.8 "Refrigerant Recovery" Properly licensed personnel authorized to recover refrigerant will remove this material after the equipment has been moved to IPF.
- 2.9 "Further Review" Equipment may sometimes contain oil capacitors, transformers or other potentially hazardous components that are not easily observed without dismantling the equipment. This process can be more easily undertaken at the IPF hazardous materials storage area.

3.0 Roles and Responsibilities

- 3.1 The faculty or department offering equipment for disposal will ensure that:
 - All equipment has been removed from the UMASS inventory control system.
 - Materials used or stored within this equipment that could cause contamination or release are removed and disposed of properly.
 - All interior and exterior surfaces have been properly decontaminated.
 - SED is electronically submitted for review by the Physical Plant Safety Officer, or designee
 - EH&S is contacted through EMPAC for All Hazards Review
 - Faculty or department will provide EH&S with as much information as possible about past use and decontamination efforts made prior to disposing of this equipment.
- 3.2 Physical Plant Safety Officer
 - Reviews electronic SED form
 - If no hazards are present, the form is forwarded to Moving Services via email
 - ➢ If hazards are present, or suspected, the form is forwarded to Physical Plant Customer Service representatives, who log the item(s) into EMPAC for an All Hazards Review.
- 3.2 EH&S Officers will be responsible for visually assessing this equipment prior to removal to ensure, (as much as possible) that this equipment conforms to the following:
 - Free of obvious contamination
 - Chemicals stored or used within or attached to this equipment have been removed
 - Other environmental groups that need to review this are contacted including Biological Safety, Radiation Safety, and Asbestos Safety.
 - If equipment contains no obvious contamination or loose materials that could easily break
 or spill during the moving process and if interior components are not visible than it can be
 suggested that this equipment be moved to IPF hazardous materials area for further revue
 by EH&S or others.

An EH&S hazardous material surplus equipment review label will be attached and this label will



indicate the status and appropriate disposal, recycling, or further review status recommendation.

The EHS designee will change the status in EMPAC to reflect a completed review.

3.3 Upon notification in EMPAC, the Physical Plant Moving Services Crew will move this equipment as labeled: either to IPF for disposal, recycling or further review as indicated by the hazardous review label.

4.0 Procedure

- 4.1 Faculty PI or department representative will contact the property office at 545-0700 to have all equipment removed from UMASS inventory. They will then submit the electronic SED form . EHS will be contacted through EMPAC for All Hazards Review. (The Faculty PI, or department representative, may, in addition to the SED form, contact EHS for a hazards review.) The primary notification should be through EMPAC, in order to properly track the hazard review process and status.
- 4.2 EH&S staff will review equipment designated for removal and will look for obvious contamination or hazardous components both inside and out. A hazardous materials review label will be attached with appropriate boxes checked off. Notification to appropriate program areas should be made at this point to ask for a review by those programs (Bio, Chem, Rad, and Asbestos). The final review will indicate if obvious hazardous components are involved and the necessary options might include;
 - Remove to IPF for refrigerant recovery
 - Remove to IPF hazardous materials area for further review by EH&S staff
 - Contains asbestos DO NOT REMOVE
 - Contains some other regulated hazardous material DO NOT REMOVE
 - Remove to IPF for disposal or recycling
- 4.2.1 Upon notification in EMPAC, Physical Plant Moving Services crew will transport to appropriate area as indicated on the label. If it is indicated on the label "DO NOT REMOVE" other arrangements for removal will be made (with EHS).

5.0 Laboratory Moves or Cleanout

- 5.1 In the event that a faculty PI, or department representative needs assistance with a larger laboratory move or a laboratory cleanout submit a service request electronically at http://www.umass.edu/physicalplant/. For some of these large cleanouts contacting Moving services in addition to the service request might bring emphasis to the project
- 5.2 These larger and more involved requests for assistance will be scheduled when time permits in order to maximize personnel and equipment. Physical plant will not move any equipment or apparatus from a laboratory without the presence of an EH&S representative or will only move equipment and apparatus that carries the EH&S hazardous materials surplus equipment review label. Integrating this work with an EH&S representative will try to ensure, (as much as possible) that all equipment is safe to load and transport. This process can make this "All Hazards Review" more efficient.

6.0 Key References

- 6.1 UMA EHS Procedures for Handling Hazardous Materials
- 6.2 UMA Physical Plant Policy for Surplus Equipment Disposal