ENVIRONMENTAL HEALTH & SAFETY

# LABORATORY RENOVATION/DEMOLITION CLEANOUT PROCEDURE

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ENVIRONMENTAL HEALTH & SAFETY

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**Department of Environmental Health & Safety**

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# DOCUMENT REVISION LOG

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## UNM's Commitment to Safety

Safety is a core value of the University of New Mexico. UNM is committed to creating and fostering a culture of safety within the community. To learn more visit https://ehs.unm.edu/culture-of-safety.html.

## Acronyms & Definitions

| | |
|---|---|
| ACM | Asbestos-containing material |
| BSC | Biosafety Cabinet |
| BSL | Biological Safety Laboratory |
| EHS | UNM Environmental Health & Safety |
| EPA | Environmental Protection Agency |
| f/cc | Fibers per cubic centimeter |
| FDC | Facilities, Design, & Construction (formerly PDC) |
| FM | UNM Facilities Management |
| HSCCP | Health Sciences Center Capitol Projects |
| HVAC | Heating Ventilation Air Conditioning |
| LBP | Lead-based paint |
| OSHA | The Occupational Safety and Health Administration |
| PDC | UNM Planning, Design & Construction |
| PEL | Permissible Exposure Limit |
| PPE | Personal Protection Equipment |
| SOP | Standard Operating Procedure |
| UNM | The University of New Mexico |

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# 1. PURPOSE

The purpose of this document is to provide guidance on projects that involve renovation or demolition of laboratories so that potential hazards to people, property and the environment can be eliminated and/or mitigated. UNM Facilities Management (FM), Facilities, Design & Construction (FDC), and Health Science Center Capital Projects (HSCCP) must follow the guidance in this document for all laboratory renovation/demolition projects. A *Lab Cleanout Checklist* is included in Attachment 1.

# 2. SCOPE

This procedure applies to all FM, FDC, and HSCCP personnel who coordinate and/or oversee renovation/demolition projects in laboratories within UNM-owned buildings. Covered activities within laboratories include:

- Demolition
- Remodeling/renovation/upgrading infrastructure such as sinks, cabinets, benchtops
- Removal/replacement of chemical fume hoods, biosafety cabinets and their associated ducting
- Removal/replacement of HVAC system and/or its associated ducting
- Drilling and/or cutting into walls, floors, ceilings
- Removal/replacement of floor tiles or ceiling tiles
- Window replacement
- Sanding/scraping of painted surfaces

# 3. RESPONSIBILITIES

## 3.1. Lab Owner/Principal Investigator (PI)

- Ensure that all chemicals and equipment to be kept are removed from the project area
- Ensure that chemicals and laboratory equipment that are destined for disposal or surplus are decontaminated and/or disposed of properly
- Ensure chemical fume hoods and biosafety cabinets are cleaned out and decontaminated

## 3.2. Department Chair

- Ensure that the lab owner/PI has followed this procedure
- Ensure that any abandoned chemicals and/or lab equipment are dealt with according to this procedure
- Ensure that funding is made available for professional decontamination of equipment, if deemed necessary by EHS

### 3.3. Environmental Health & Safety (EHS)

- Inspect project area before renovation/demolition activities begin
- Conduct asbestos records searches
- Conduct asbestos, lead, and hazardous materials surveys and sampling, if required
- Provide guidance on hazardous chemicals that may be present
- Provide guidance on decontamination and waste disposal
- Conduct or coordinate project monitoring during abatement, including the collection of area air samples
- Notify building managers and occupants of abatement activities
- Sign asbestos/hazardous waste manifests
- Review all clearance testing documentation and give permission to reoccupy space
- Maintain records

### 3.4. UNM Project Manager -- Facilities Management (FM), Facilities, Design & Construction (FDC) &/or Health Sciences Center Capital Projects (HSCCP)

- Ensure that this procedure is followed
- Notify EHS of planned renovations/demolitions of lab spaces and/or any activity that may release asbestos fibers, lead dust or hazardous chemicals
- Submit an Asbestos Records Request Form via the EHS website for any activity that may release asbestos fibers or lead dust
- Coordinate with EHS on all projects that may release asbestos fibers, lead dust or hazardous chemicals
    - FM, FDC and/or HSCCP may take the lead on these projects, but must keep EHS "in the loop" by providing the Scope of Work and project schedule for contractor chosen to do the work
- Ensure FM, FDC and/or HSCCP employees with potential exposure to asbestos-containing materials (ACM), lead-based paint (LBP) and/or hazardous chemicals receive appropriate training (see Section 4)
- Coordinate with EHS to get signatures on asbestos and/or hazardous waste manifests
- Ensure EHS receives copies of all documentation generated during projects that involve ACM, LBP and/or hazardous chemicals

## 4. Training Requirements

All FM, FDC, and HSCCP personnel who oversee laboratory renovation/demolition projects or whose work includes the potential for exposure to asbestos, lead and/or hazardous chemicals, must take the following trainings each year, which are available on Learning Central:

- Asbestos Hazard Awareness
- Lead Awareness
- Chemical Safety Overview

Contractors who perform ACM and/or LBP abatement must have appropriate training in accordance with the requirements in 1926.1101 or 1910.1001 and with the EPA Model Accreditation Program. Only contractors approved by EHS may be used for abatement of hazardous materials on UNM campus.

# 5. Pre-Renovation/Demolition Requirements

A checklist of the items that must be addressed prior to the commencement of renovation/demolition activities in a laboratory is included as Attachment 1.

## 5.1. Notification of EHS

EHS must be notified of all projects that involve the activities described in section 2. The UNM Project Manager (FM, FDC or HSCCP) or their designee must notify EHS by calling 505-277-2753 or by sending an email to ehsweb-L@list.unm.edu.

## 5.2. Notification of Building Occupants

The UNM Project Manager must notify the Building Manager of the project schedule and scope of work. If there is no Building Manager, notification must be given to the Department Chair(s) within the building. EHS maintains a list of all Building Managers and Department Chairs.

## 5.3. Records Request

Prior to any activities that may disturb suspect ACM or LBP, an Asbestos Records Request must be submitted to EHS. EHS will provide any available records to the requestor and to the appropriate UNM Project Manager (FM, FDC or HSCCP).

## 5.4. Surveys & Sampling

### 5.4.1. Asbestos and/or Lead

If no records exist, an asbestos and/or lead-based paint survey and sampling must be conducted to identify all suspected ACM and LBP within the project area.

- ACM and LBP surveys and sampling must be conducted by a certified Asbestos Building Inspector.
    - EHS has a certified Asbestos Building Inspector on staff who can coordinate sampling by a contractor for large, planned projects (such as renovations or demolitions).
    - EHS can conduct limited sampling for small, unbudgeted projects (such as drilling into a wall to install a shelf) and for urgent issues (such as a flood or leak).
- If EHS is unavailable or the UNM PM has informed EHS of their intention, the UNM Project Manager shall hire a contractor to perform the work.

EHS must be provided with copies of all survey and sampling reports generated by a contractor.

### 5.4.2. Biological Safety Laboratories

Prior to conducting renovation/demolition activities in a BSL-2 or BSL-3 lab, the UNM Project Manager must notify the UNM Biosafety Office at 505-272-8001. The Biosafety Office is able to provide information on the type(s) of biological materials used in the lab. This information is needed to determine if the lab requires decontamination prior to work activities.

- If renovation/demolition activities include the removal of biosafety cabinets (BSCs), the cabinets must be decontaminated by the department or the PI that owns the BSC.

- BSCs previously used for BSL-3 operations must be professionally decontaminated; EHS can supply information on vendors that provide this service.

### 5.4.3. Radiation Contamination Survey

Prior to conducting renovation/demolition activities in a lab in which radioactive materials are used, the UNM Project Manager must notify the Radiation Safety Office at 505-925-0743. The Radiation Safety Office will conduct a survey to determine if radiation contamination is present in the lab.

## 5.5. Hazardous Material & Equipment Removal

Prior to the commencement of renovation/demolition activities, the PI/lab owner must remove all hazardous materials and equipment from the project area. Hazardous materials and equipment that must be moved include:

- Chemicals
  - EHS can provide assistance by loaning the use of spill-proof bins for chemical transport
- Biological materials
- Radioactive materials
- Glassware
- Equipment (small, portable) that isn't included as infrastructure

EHS can provide FM, FDC and/or HSCCP with an inventory of hazardous chemicals that are currently being used in any laboratory at UNM. This information can help determine the decontamination process that may be required.

## 5.6. Decontamination

It is the responsibility of the PI and the department to ensure that laboratory surfaces and equipment have been cleaned and/or decontaminated prior to renovation/demolition of the lab. The PI or department may contract with a vendor that provides these services. EHS can provide a list of approved vendors.

Lab surfaces and equipment that must be cleaned/decontaminated include:

- Benchtops and counters
- Sinks
- Furniture
- Shelving
- Floors
- Refrigerators and freezers
- Equipment – incubators, water baths, centrifuges
- Fume hoods and biosafety cabinets

*Laboratory Decontamination Procedures* is included as Attachment 2 and *Laboratory Equipment Decontamination Form* is included as Attachment 3.

### 5.7. Fume Hoods, Biosafety Cabinets & Associated Ducting

If renovation/demolition activities include the removal of a chemical fume hood, the fume hood must be decontaminated by the PI, the department, or an approved vendor prior to renovation/demolition activities.

- EHS maintains a list of vendors who can provide this service
- EHS can provide an inventory of chemicals currently being used in any laboratory

If renovation/demolition activities include removal of chemical fume hood ducting, samples must be collected by a qualified contractor and analyzed by a laboratory to determine if any chemical exposure hazards are present. In lieu of sampling, the contractor may assume the ducting is contaminated with hazardous materials and take appropriate precautions.

- The UNM Project Manager must consult with EHS to make this determination
- EHS can coordinate the collection of samples, if necessary
- If samples are collected, they must be analyzed for the presence of RCRA metals and perchlorates
- If samples are not collected, it should be assumed that there are chemical exposure hazards present and contractors must wear a minimum of Level C PPE (including half-face respirator with acid gas and particulate/P100 cartridges) while handling ducting

## 6. DURING-PROJECT REQUIREMENTS

### 6.1. Contractor Oversight

It is the responsibility of the UNM Project Manager to ensure that the abatement contractors follow these procedures. The Project Manager must also:

- Arrange access to the project area
- Identify location of nearest utilities
- Identify location of nearest fire extinguishers and evacuation routes
- Inform the contractor of any specific hazards in the project area (chemicals, radiation, lasers, etc.)

EHS can assist with these responsibilities upon request from the Project Manager.

### 6.2. Lead and/or Asbestos Project Containment

All lead and/or asbestos abatement activities within occupied buildings must be conducted per regulations set forth in 29 CFR 1926.1101 and 29 CFR 1926.62. Refer to the *Lead & Asbestos Management Plan* for more detailed information on the requirements for overseeing a lead and/or asbestos abatement project.

### 6.3. Project Perimeter Air Sampling/Monitoring

During a lead and/or asbestos abatement project that requires the use of a containment system, area air samples must be collected by EHS or by a UNM-approved contractor if the surrounding area is occupied. Refer to the *Lead & Asbestos Management Plan* for more detailed information on the requirements for overseeing a lead and/or asbestos abatement project.

# 7. POST-PROJECT REQUIREMENTS

## 7.1. Clearance Sampling

When asbestos or lead abatement activities have ceased, but before containment has been removed, additional air samples must be collected and analyzed by a laboratory. The area cannot be cleared for reoccupation until laboratory data proves the concentration of lead dust and/or asbestos fibers is below the PELs.

- Clearance sampling must be conducted by a certified Asbestos Building Inspector.
  - EHS has a certified Asbestos Building Inspector on staff who can conduct clearance sampling.
- If EHS is unavailable, the UNM Project Manager shall hire a contractor to perform the work.
  - EHS must be provided with copies of all sampling reports generated by a contractor.

If clearance sample results are below the asbestos PEL of 0.01 f/cc, the project area will be deemed by EHS to be safe for re-occupancy or further renovation/demolition.

## 7.2. Waste Disposal

### 7.2.1. Universal Waste and E-waste

It is the responsibility of the PI and the department to ensure that all wastes are removed from the lab and disposed of properly prior to the commencement of renovation or demolition activities.

Fluorescent tubes/lamps and batteries are accepted by FM Recycling.

- Fluorescent tubes/lamps must be boxed, taped closed and labeled with the contents (type and # of lamps/tubes) and the department name.
- Batteries must be boxed, bagged or otherwise contained.
- It is the responsibility of the PI or the department to either deliver bulbs and batteries to FM Recycling or to submit a Service Request to FM Recycling for pick these items up.

E-waste such as computers, printers and other electronic equipment is accepted by UNM Surplus Property.

- It is the responsibility of the PI or the department to notify Surplus Property via their disposal request process located at UNM Surplus Property (https://surplus.unm.edu).

### 7.2.2. Hazardous/Chemical Waste

Any chemicals that are not going to be kept by the PI and/or are not moved out of the work area prior to the commencement of renovation/demolition activities will be considered waste chemicals. Waste chemicals must be disposed of through EHS.

- It is the responsibility of the PI or the department to complete and submit a Chemical Waste Pickup Request form (https://ehs.unm.edu/waste-management/index.html) to EHS at chemsafety-L@list.unm.edu

### 7.2.3. Asbestos Waste

The abatement contractor must coordinate with EHS to get a signature on the asbestos waste manifest before the waste can be taken off the work site. A list of current EHS employees who are certified to sign waste manifests is included as Attachment 4. Refer to the Lead & Asbestos Management Plan for more detailed information on disposal of asbestos waste.

### 7.2.4. Chemical Fume Hood Ducting

The UNM Project Manager must notify EHS if renovation/demolition activities include the need to permanently remove chemical fume hood ducting. EHS will coordinate the collection of wipe samples from fume hood ducting that is to be removed. Laboratory analysis of wipe samples will determine if the ducting must be disposed of in a landfill or if it can be accepted as metal scrap by FM Recycling.

## 8. Record Keeping

EHS maintains a database for keeping track of all areas at UNM with confirmed ACM, PACM, and LBP, and areas where the existence of such materials has been ruled out. This database is used to complete records requests and therefore must be continuously updated as new records are generated. Records that are generated during projects managed by FM, FDC and/or HSCCP *must be sent to EHS*.

Records generated internally (by FM, FDC, HSCCP, EHS) include:

- Scopes of work
- Contractor proposals
- Memos
- Sampling/monitoring reports

Records generated by abatement contractors that must be submitted to UNM within 30 days of project completion include:

- Daily logs
- Waste manifests
- Medical surveillance records
- Employee training certificates

For additional and more detailed information on managing projects that involve asbestos and lead hazards, refer to the UNM Lead & Asbestos Management Program. (insert link when it has been added to EHS website)

**END OF DOCUMENT**

# Attachment 1 – Lab Cleanout Checklist

| Done | **The UNM PM must ensure all items on this list are addressed prior to beginning lab renovation/demolition** |
|---|---|
| | **Notification of EHS** |
| | Notify EHS (505-277-2753 or ehsweb-L@list.unm.edu) of all lab renovation/demolition projects |
| | |
| | **Notification of Building Occupants** |
| | Notify the department chair and/or building manager of the project scope and schedule |
| | |
| | **Records Request** |
| | Submit an Asbestos Records Request to EHS prior to beginning the project |
| | Asbestos Records Request is located under the Construction Safety tab at ehs.unm.edu |
| | |
| | **Sampling & Analysis for Asbestos** |
| | Samples must be collected from the project area by a contractor if there are no records |
| | Samples must be sent to a lab for asbestos fiber analysis |
| | Lab reports must be provided to EHS |
| | |
| | **Sampling & Analysis for Lead and Perchlorates** |
| | If fume hood ducting is to be removed: samples must be collected from the interior of ducting by contractor |
| | Samples must be sent to a lab for lead (Pb) and perchlorates analysis |
| | Lab reports must be provided to EHS |
| | NOTE: Fume hoods to be removed must be decontaminated by department or vendor hired by department |
| | |
| | **For Biological Safety Labs (BSL-1, BSL-2, BSL-3)** |
| | Notify UNM Biosafety Office (505-272-8001) to get info on biological materials used in lab |
| | NOTE: Biosafety cabinets to be removed must be decontaminated by department or vendor |
| | |
| | **For Labs with Radioactive Materials** |
| | Notify UNM Radiation Safety Office (505-925-0743) to request a radiation contamination survey |
| | |
| | **Hazardous Material & Equipment Removal** (responsibility of department and lab owner) |
| | Remove all chemicals (solids, liquids, gases) from the lab |
| | Remove all biological materials from the lab |
| | Remove all radioactive materials from the lab |
| | Remove all glassware from the lab |
| | Remove all equipment (small, portable) that isn't considered infrastructure from the lab |
| | Remove all waste from the lab |
| | |
| | **Decontaminate** (responsibility of department and lab owner; may be done by a vendor hired by department) |
| | Benchtops, counters, sinks |
| | Floors |
| | Shelving |

| | |
|---|---|
| | Furniture |
| | Equipment (incubators, centrifuges, refrigerators, freezers) |
| | Fume hoods |
| | Biosafety cabinets (if BSL-3 lab, must be professionally decontaminated by a vendor) |
| | |

# Attachment 2 – Lab Decontamination Procedures

ENVIRONMENTAL HEALTH & SAFETY

# Laboratory Decontamination Procedures

Laboratory surfaces and equipment can be contaminated with a variety of materials. When labs are scheduled for renovation or demolition, or when lab equipment is scheduled to be serviced, moved, temporarily stored, sent to surplus, or disposed of, a thorough cleaning and decontamination must occur so that others who come in contact with lab surfaces and equipment are not exposed to hazardous materials previously used in the lab.

Ensuring that lab surfaces and equipment are cleaned and decontaminated is the responsibility of the laboratory Principal Investigator (PI) or their designee. If these individuals are no longer at the university, it becomes the responsibility of the department that owns the laboratory and/or equipment.

**Items That Require Decontamination -** Laboratory surfaces and equipment that must be decontaminated include, but are not limited to:

- Benchtops and counters
- Sinks
- Furniture
- Shelving
- Floors
- Chemical Fume Hoods
- Biosafety Cabinets
- Refrigerators & Freezers
- Incubators
- Water Baths
- Centrifuges

These items may be contaminated with:

- Hazardous Materials (residues of materials that are toxic, corrosive, flammable, reactive)
- Biohazardous Materials (infectious agents, rDNA material, biologically-derived toxins, human and animal tissues and bodily fluids)
- Radioactive Materials

## Hazardous Materials Decontamination Procedures

For labs where hazardous materials such as acids, bases, flammables, and toxins were used:

1. Put on PPE - minimum PPE required is a lab coat, hand protection (gloves) and eye protection (goggles).
2. Mix 1 part Alconox® with 100 parts warm water to create a 1:100 Alconox® solution and pour into a spray bottle.
3. Spray all surfaces and equipment with the Alconox® solution, then wipe down with paper towels.
4. Used gloves, sponges and paper towels can be disposed of as regular trash.

For labs where toxic metals that ***are not*** water reactive were used:

1. Put on PPE - minimum PPE required is a lab coat, hand protection (gloves) and eye protection (goggles).
2. Mix 1 part trisodium phosphate (TSP) with 4 parts water to create a 25% aqueous solution of TSP and pour solution into a spray bottle.

3. Spray all surfaces and equipment with the TSP solution, then wipe down with paper towels.
4. Collect the paper towels and rinseate in a container and submit to EHS for disposal as hazardous waste.

For labs where **water reactive materials were used**:

- Refer to the Safety Data Sheet for guidance on decontamination procedures.

## Biological Materials Decontamination Procedures

For Biological Safety Laboratories (BSL-1 and BSL-2 only)

1. Put on PPE - minimum PPE required is a lab coat, hand protection (gloves) and eye protection (goggles).
2. Mix 1 part Tergazyme® detergent with 100 parts water OR mix 1 part bleach with 10 parts water to create a 1:100 Tergazyme® solution or a 1:10 bleach solution and pour solution into a spray bottle.
3. Spray all surfaces with the Tergazyme® or bleach solution.
    - Allow cleaning solution to remain in contact with equipment surfaces for 10 minutes.
    - When bleach is used, follow with a wipe down using 70% ethanol to remove residual chlorine, which may corrode stainless steel.
4. For biological safety cabinet (BSC) decontamination, wipe down the primary work surface, underlying catch basin, side walls, back wall and interior surface of the window with the Tergazyme® or bleach solution. To decontaminate the catch basin, remove the front intake grill, lift out the work surface tray and wipe off interior with a paper towel soaked with the Tergazyme® or bleach solution.
    - When taking a BSC out of service, a BSC certifier/vendor must be contacted for gaseous decontamination.

For Biological Safety Laboratories (BSL-3)

- BSL-3 laboratories must be professionally decontaminated. EHS can provide a list of approved vendors that provide this service.

## Radioisotope Decontamination Procedures

For radioisotope decontamination assistance, contact the Radiation Safety Office at 505-925-0743.

For questions about equipment decontamination, contact Environmental Health & Safety at 505-277-2753 or send an email to chemsafety-L@list.unm.edu.

For questions about the process of submitting equipment for surplus, contact Surplus Property at 505-277-2923 or refer to the Surplus Property website (https://surplus.unm.edu).

# Attachment 3 – Lab Equipment Decontamination Form

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# Laboratory Equipment Decontamination Form

The lab PI or their designee must decontaminate lab equipment prior to the equipment being handled by anyone other than the PI (prior to being serviced, moved, or disposed of). Attach the completed form to each piece of equipment that has been decontaminated.

This equipment is being decontaminated for ☐ Relocatio ☐ Repair ☐ Storage or

Type of Equipment/Model: _____ Serial #: _____

Building: _____ Room: _____ Bay: _____

Dept./Div.: _____ Owner/PI: _____ Phone: _____

1. ☐ **Decontamination method for equipment exposed to Biohazardous Material** ☐ N/A
   - ☐ Disinfected using (check one):
     - ☐ 2 % Wescodyne ☐ 10% bleach ☐ Other: _____
   - ☐ Biohazard label removed
2. ☐ **Decontamination method for equipment exposed to Hazardous Chemicals** ☐ N/A
   - ☐ Removed, cleaned and/or neutralized with appropriate detergent such as Alconox (refer to MSDS, etc.)
   - ☐ Captured materials contained and labeled as Hazardous Waste
3. ☐ **Decontamination method for equipment exposed to Radioactive Material** ☐ N/A
   - ☐ Fully monitored for radioactive materials (inside and out), has been decontaminated, and is not radioactive Radiation
   - ☐ hazard label removed
   - ☐ UNM Radiation Safety Office (505-925-0743) has cleared the equipment
4. ☐ **Incubator water jacket** -- drained and $CO_2$ disconnected ☐ N/A
5. ☐ **Stored energy** (e.g., electrical, pneumatic) -- discharged or de-pressurized ☐ N/A
6. ☐ **Refrigerator/freezer** -- contents have been removed & unit wiped down ☐ N/A
7. ☐ **Unwanted/broken equipment --** wiped down and list has been sent to Surplus Property ☐ N/A
8. **Universal Waste (bulbs, batteries)** -- boxed, labeled; submit Service Request to FM Recycling for pickup N/A

**I certify that, to the best of my knowledge, the equipment is free of hazardous materials or hazards, including those noted above.**

Signature: _____ Name: _____ Date: _____

Comments: _____

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# Attachment 4 – Waste Manifest Signers

# EHS Employees Authorized to Sign Waste Manifests

The following staff members at EHS have taken the training required by the US Department of Transportation, as defined in 49 CFR Part 172, Subpart H, and are qualified to sign hazardous and special waste manifests:

- Thomas Evans, Safety Specialist -- 505-553-0433
- Sane Magagula, Professional Intern/Technical – 313-622-0140
- Melissa Terry, Chemical Hygiene Officer – 415-797-2223

# Laboratory Renovation Demolition Procedure - R1

Final Audit Report 2025-01-16

| | |
|---|---|
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