

Harvard Laboratory Moveout or Renovation Guidelines

INTRODUCTION

There are four common reasons for vacating your current laboratory. This guide is applicable if the current laboratory:

□ is being renovated.
\square is relocating from one lab space to another within an adjoining building
☐ is relocating from one lab space to another within the University.
□ is departing the University.

These moveout guidelines are designed to establish a pragmatic approach for lab moves in order to minimize:

- ✓ hazardous exposures,
- ✓ regulatory violations,
- ✓ chemical spills,
- ✓ disposal costs associated with the discovery of unknown or high-hazard chemicals,
- ✓ undue delays in contractor activity or re-occupancy.

A successful laboratory move requires cooperation and effective communication between department coordinators (ex. Associate Dean at SEAS, Science Operations and Lab Directors at FAS, ROMs at HMS/HSDM, ROMs/LSOs at HSPH), department administrators, lab coordinators, move coordinators, space coordinators, laboratory personnel, EH&S and waste disposal vendors.

The lab clean-out process requires lead time of at least one (1) month. At the end of this lab clean out process, all research materials including biological, radiological and hazardous chemical raw material and waste should be removed. There may still be remaining concerns related to asbestoscontaining materials, sink neutralization ("chip") tanks, residual contamination in exhaust systems and ductwork, etc. EH&S will work with department coordinators and facility managers to identify and remediate the remaining potential hazards.

ROLES & RESPONSIBILITIES

Principal Investigators are principally responsible for safety and environmental health in the lab. They are responsible for:

- 1. identifying hazards associated with work in the lab;
- 2. proper registration/termination of research;
- 3. reinforcing safe practices;
- 4. ensuring that the lab follows pertinent regulations and prudent practices;
- 5. commissioning and decommissioning laboratories, which may include designating a Lab Move Coordinator.

Lab Move Coordinators may be lab personnel or hired by the department/school. The Move Coordinators are responsible for:

- notifying the department coordinator and department administrator of the planned move;
- following the Lab Moveout <u>Timeline</u> and <u>Checklist</u>, provided in Attachments MO-1 and MO-2, to ensure that the lab is emptied by the end of the move;
- arranging with EH&S for appropriate support throughout the course of the move;
- following any additional guidance or direction, as determined by department coordinator, department administrator, PI and EH&S.

Department Coordinators (ex. Associate Dean at SEAS, Science Operations at FAS, ROMs at HMS/HSDM, LSC/LSOs at HSPH) serve as primary contacts working with department administrators regarding impending construction, renovation and other related physical and laboratory personnel changes. They are responsible for:

- 1. providing these Moveout Guidelines to Principle Investigators and lab move coordinators.
- 2. reviewing the completeness of the moveout steps, obtaining necessary signatures, or documenting any verbal or email approval (by writing your initials on the signature line and the name of the approver), on the Lab Moveout Sign-off Sheet (Attachment MO-3).
- 3. informing the lab move coordinator and EH&S of any department specific moving requirements and answering department specific question.
- 4. posting the completed Lab Moveout Sign-off Sheet (MO-3) on the main lab entrance.

Request EH&S support, as necessary.

To request this document in an alternative format contact ehs@harvard.edu

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Attachment MO-1

Harvard Laboratory Moveout or Renovation Timeline

1 MONTH OR GREATER	A PRIOR TO MOVE
Principal Investigator or designated Lab Move Coordinator:	 Contact department coordinator and department administrator regarding pending move. Contact EH&S's <u>Lab Safety Advisor</u> regarding pending move. Notify the LSA of any radioactive or biological materials to be moved. Certain permits, shipping requirements, material destruction and/or transfer requests may take several months of preparation.
Department Coordinator:	 Meet with Lab Move Coordinator. Provide <u>Lab Moveout Guidelines</u> to Lab Move Coordinator.
3-4 WEEKS PRIOR TO	MOVE
Lab Move Coordinator:	Ensure that lab takes steps identified in the Lab Moveout Checklist.
Department Coordinator:	Contact EH&S regarding pending move that may generate hazardous chemical wastes (x2-1720 or <u>lab_safety@harvard.edu</u>).
2 WEEKS PRIOR TO MO	OVE
Lab Move Coordinator:	 Continue to conduct lab clean out per checklist in order to thoroughly remove hazardous raw materials and wastes. Perform any specialized lab-specific clean out activities as determined by department coordinator and/or EH&S. Cease experiments.
THROUGHOUT THE MO	OVE
Waste:	EH&S ensures that all waste chemicals that constitute a potential hazard are removed and disposed of in accordance with applicable local, state and federal regulations.
Billing:	The waste service vendor will submit an itemized invoice for laboratory clean outs directly to the school, department or laboratory, depending on the scope of the move project.
Record Keeping:	EH&S will retain possession of regulatory-mandated paperwork and maintain files for each clean-out, including Hazardous Waste Manifests /Land Disposal Restriction forms, Hazardous Waste Profiles, etc.
AFTER THE MOVE	•
Department Coordinator:	Ensure that lab <u>sign-off</u> sheet is signed and posted on the main entrance to lab affected by the move or renovation. (Retain a copy until renovation is complete.)
	2. Lock all entrances to lab, barring entrance until further notice.3. Anticipate planned renovation of the now-vacant space, coordinating access to the lab with your project manager.

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Attachment MO-2

Harvard Laboratory Moveout or Renovation Checklist

Buil	ling:	Room #(s):		
Prin	cipal Investigator:	Department:		
Pers	on completing this form:	Title:	Phone:	
Ite	em			Completed
	A. Planning			
1.	Principal Investigator (PI) recognizes and accept and either takes on role as movecoordinator or appo		eout process	☐ Yes
2.	Lab Move Coordinator alerts department coordinater alerts department coordinater alerts department coordinater alerts department coordinater alerts department alerts department coordinater alerts department coordin	of moving activities. Be sure to identi	ify the research	☐ Yes
3.	Lab Move Coordinator reviews this checklist radioactive materials, lasers, chemicals and other eq EH&S at lab.safety@harvard.edu or by phone with information at the end of this checklist.	quipment in separate sections; review	v all sections. Contact	☐ Yes
4.	Cease lab work. PI and/or lab move coordinator a cease. This will enable lab clean-up and packing. We			☐ Yes ☐ N/A
	Notes:			

Item Completed B. BIOLOGICAL MATERIALS, WASTE AND EQUIPMENT -For moves to any Harvard location, submit a COMS amendment in eCOMS Login. ☐ Yes Request letter. -For moves out of Harvard, inactivate COMS registered research. In both cases, the PI must provide N/A notification to the EH&S Biosafety Officer and indicate the COMS research project #. 2. Identify biological materials and samples stored in refrigerators, freezers, cold rooms, warm rooms, incubators and other areas, as applicable. Follow any protocols in place for autoclaving infectious or Yes potentially infectious solid materials prior to placing waste into biological waste bins/burn boxes. Note: Non-infectious solid biological materials may be discarded directly into biohazard boxes for disposal. Properly inactivated liquid waste can be disposed of down the drain. Contact your Biosafety Officer with questions. **Dispose all unwanted sharps**, including but not limited to needles, syringes, blades, scalpels, glass Pasteur pipettes, used microscopeslides and cover slips, and other contaminated broken glass. Search all surfaces Yes (especially shelves, drawers, and electrical power strips over bench tops) for sharps. Place all these items in Biological Sharps containers. Place closed single-use containers into biowaste bins/box (reusable □ N/A containers will be picked up directly). Custodians will not collect: (1) sharps containers found in laboratories or (2) improperly marked, damaged or wet biowaste bins/boxes. Remove and discard accordingly all absorbent pads (blue "Chux") taped to counter tops (if applicable). ☐ Yes Decontaminate bench tops with appropriate chemical disinfectant or abrasive powder or both. Disinfect the content of aspirating flasks before pouring the content down the drain. Add a solution of Yes 10 to 20% bleach, letting it stand for 20 to 30 minutes before discarding. □ N/A Disinfect all equipment (e.g., shakers, refrigerators, freezers, cryostats, water baths, incubators, centrifuges) used to store or handle infectious or potentially infectious materials. Select an effective chemical disinfectant solution (e.g., 10% bleach solution which is a general disinfectant) that will deactivate the agent and not harm equipment. Label decontaminated equipment. Call your EH&S Biosafety Officer if you have questions. ☐ Yes Notes: Make sure to use appropriate personal protective equipment (i.e., gloves, goggles and lab coat) while disinfecting. *Vented incubators used for infectious materials should be gas-decontaminated (for decontamination of spaces between exterior and interior walls of the incubator). Do not remove the Biohazard Warning sticker if such spaces cannot be decontaminated. Call in the service vendor if necessary. Decontaminate and clean Biological Safety Cabinets (BSCs) with appropriate chemical disinfectant. ☐ Yes BSCs used for infectious materials must be completely decontaminated by a service contractor before being relocated. Call the BSC certification vendor for service (see the annual certification sticker affixed on the front of the BSC) or contact your **Biosafety officer** for assistance. 8. Cover and seal with impervious material any contaminated part that cannot be disinfected. Use ☐ Yes plastic wrap, parafilm, etc. Then, apply a biohazard label before moving it. Contact your moving company representative to discuss any special moving procedures. Contact an EH&S Biosafety Officer if you want further □ N/A advice. **Remove or deface all Biohazard Warning stickers** on newly-decontaminated equipment that will not be ☐ Yes reused for similar research. □ N/A 10. Package and seal all biological waste before removal. Contact your custodial service provider for additional ☐ Yes biowaste bins and burn boxes and pickup. □ N/A 11. **Offer any appropriate materials for reuse** by other laboratories by alerting your department coordinator and/or Harvard Sustainability. This includes biologics or lab supplies (see F.2 for equipment). ☐ Yes Notes: Unwanted uncontaminated or rinsed whole or unbroken glassware in cardboard boxes. Seal filled boxes □ N/A with tape, labeling them "Unbroken Glass (Recyclable)". These boxes will be picked up by Custodial Services for recycling. Alternatively, manage these wastes together with broken glassware in Step C.3.

Item Completed C. RADIOACTIVE MATERIALS, WASTE AND EQUIPMENT (INCLUDING LASERS) Lab move coordinator ensures that the Permit Holder notifies the EH&S Department's Radiation Protection Office (RPO) and Lab Safety Advisor at least 30 days before moving or renovating a lab that uses radioactive materials or terminating work with any radionuclides at Yes radiation protection@harvard.edu. The RPO will review the required actions with the Permit Holder and work with the lab to ensure compliant relocation or termination. The Permit Holder must ensure the proper transfer □ N/A of materials, devices and records as well as the completion of appropriate bioassays and RPO- conducted lab termination surveys before the space is vacated. The RPO will make all arrangements for transfers of any radioactive materials (including samples) to any off-campus location. Arrange for RPO to collect and reuse or recycle lead bricks, pigs (small, egg-shaped receptacles that carry ☐ Yes radioisotopes), shielding, aprons and stock containers. □ N/A Remove and properly dispose of all stock solutions, radioactive samples, and radioactive waste from the Yes lab. If radioactive materials transfer to another location, do so only as specifically directed by the RPO. □ N/A Contact RPO prior to transferring or disposing of lasers. All Class 3B and 4 laser devices need to be Yes accounted for and proper transfer or disposal needs to be recorded by the RPO. Clean all equipment used to hold or shield radioactivity and survey the equipment to confirm adequate ☐ Yes decontamination. Identify, label and place in a secure area any contaminated items for further decontamination or for storage/transfer as directed by the RPO. □ N/A Coordinate with RPO for conducting a radiation survey to release the area for renovation or remove from the lab's permit. This survey will look at the radioactive material inventory, radiation Yes generating devices and radiation contamination levels. When the area is acceptable, the RPO will deface or □ N/A remove all radioactive labels, signs, and postings. Retain a copy of the survey. If the lab is leaving the University, notify the Radiation Protection Office to cancel all ☐ Yes radiation badges (dosimeters) associated with your lab. Return any remaining dosimeters to the attention □ N/A of RPO Dosimetry Program. D. CHEMICALS AND HAZARDOUS WASTE Yes Contact EH&S again (Lab Safety Advisor directly) three weeks before the moving date. □ N/A Assess Chemical inventory. This includes cold/warm rooms and chemical/flammables storage areas. Follow guidelines for biologicals and radioactive materials covered in the proceeding sections. Designate Yes chemicals to be kept, which are appropriate for reuse, and which will be disposed of as waste. □ N/A Offer any appropriate materials for reuse by other laboratories by alerting department coordinator and/or Harvard Sustainability. This includes chemicals or lab supplies (see F.2 for equipment). Yes Notes: Unwanted uncontaminated or rinsed whole or unbroken glassware in cardboard boxes. Seal filled boxes with tape, labeling them "Unbroken Glass (Recyclable)". These boxes will be picked up by Custodial □ N/A Services for recycling. Alternatively, manage these wastes together with broken glassware. Determine transport method for hazardous chemicals. Yes There are many options for chemical transport or relocation companies to assist. Contact EH&S for guidance.

5.	Request any supplies such as hazardous waste labels and containers at ehs.harvard.edu/tools/hazardous-waste-pickup- services-online-request or phone.	Yes N/A
		11/11
6.	Label all chemical waste containers with the chemical name and chemical hazards (e.g. toxic, corrosive, flammable) on hazardous waste. <u>Do not use abbreviations, trade names or chemical formulas</u> . For aid in determining the type of waste, review the SDS. Notes: For virgin chemicals, a waste label is required. If the lab is disposing of a large quantity of chemicals, you can request quotes from vendors such as Triumvirate or Clean Harbors, who can aid in packing, labeling and removal of waste.	Yes N/A
7.	Alert EH&S and chemical transport company, and clearly label Potentially Unstable Chemicals as "DANGER: POTENTIALLY UNSTABLE! MOVING THE(SE) CHEMICAL(S) COULD RESULT IN: EXPLOSION, SPONTANEOUS COMBUSTION, OR FIRE. Notes: Potentially Unstable Chemicals Reference. EH&S coordinates proper disposal of these chemical(s). Improper disposal can result in severe bodily harm. Call EH&S for more information. Examples include diethyl ether, organic peroxides, and picric acid.	Yes N/A
8.	Alert EH&S of any leaking or otherwise compromised containers An outside vendor such as Triumvirate or Clean Harbors can assist. Reach out to EH&S for more information.	Yes N/A
9.	Collect all hazardous waste in satellite accumulation areas(SAAs) within each lab involved in the move/renovation. Segregate incompatible chemicals by means of a physical barrier (e.g., plastic secondary bins or trays).	Yes N/A
10.	Dispose all unwanted sharps , including but not limited to needles, syringes, blades, glass Pasteur pipettes, and other chemically <u>contaminated broken glass</u> . Search all surfaces (especially shelves, drawers, and electrical power strips over bench tops) for sharps. Place all these items in Sharps containers and request pick-up online <u>pickup request tool</u> or phone.	Yes N/A
	Request that EH&S pick up the generated hazardous waste (including mercury wastes) using online pickup request tool or phone. Notes: Again, if the lab is disposing of a large quantity of chemicals, you can request quotes from vendors such as Triumvirate or Clean Harbors, who can aid in packing, labeling and removal of waste.	Yes N/A
13.	Decontaminate surfaces with an appropriate disinfectant or cleaner (based on potential contaminants) once all hazardous materials are removed from storage equipment (e.g., cabinets) and work surfaces (e.g., shelves, countertops).	Yes N/A
14.	Discard all unwanted, non-hazardous chemicals (e.g., distilled and deionized water, buffer and saline solutions) down the drain once all chemical/hazardous, biological and radioactive wastes identified above are managed, and you have reviewed the types of hazardous chemicals prohibited or limited from discharge into sinks at ehs.harvard.edu/files/wastewater_sink_disposal_guidance.pdf . If there is any question about whether a chemical is non-hazardous, contact your Lab Safety Advisor , or EH&S.	Yes N/A
E.	Controlled Substances	
1	Arrange for disposal of controlled substances through EH&S or notify your Controlled Substances Administrator (FAS/SEAS only). Contact EH&S for guidance. -It MAY be possible to transfer ownership of a controlled substance to another DEA permit-holder. See Controlled Substance Researchers' Guide at ehs.harvard.edu/files/controlled substance researchers guide.pdf. -If you are not the license holder, contact your Controlled Substances Administrator to arrange for temporary storage of drugs during relocation process. Notes: Abandonment and inadequate documentation of disposal of a controlled substance are violations of the federal permit under which it was held.	Yes N/A
2	2. If moving on campus notify building managers that a narcotics cabinet needs to be relocated and provide updated cabinet location to your Controlled Substance Administrator.	Yes N/A
F	. ALL OTHER EQUIPMENT AND AREAS	

1.	Return to vendors any reusable gas cylinders and lecture bottles that are no longer needed. Alternatively, contact Airgas which may collect their cylinders and lecture bottles, or contact EH&S to arrange	Yes N/A
2.	for disposal of single-use lecture bottles. Identify wanted equipment and move once emptied. Decontaminate and de-energize to the degree	
	necessary (specifications above for biological or radiological contamination). If moving within the same building contact your building manager to facilitate the move. If moving to a different area, a mover is recommended.	Yes N/A
3.	Identify working, but unwanted, equipment. Decontaminate and de-energize to the degree necessary (specifications above for biological or radiological contamination). Email your department coordinator and/or contact Harvard Sustainability with a list of such equipment. Include name of item, make, model, dimensions, past service contractor, any shortcomings, your name, telephone, email address, and location of the equipment.	Yes N/A
4.	<u>For moves off-campus</u> , defrost, empty & decontaminate freezers & refrigerators (to ensure restricted items are not inadvertently moved).	Yes N/A
5.	Drain oil from vacuum pumps and similar oil- or chemical-filled equipment into containers prior to disposal of any such oil-containing equipment, and label as hazardous waste (oil is regulated as a hazardous waste in Massachusetts). If such pumps are moved intact to a new location, carefully transport the pumps to avoid oil spills.	Yes N/A
6.	Bound for trash equipment: - Bleed any stored energy from electrical equipment (e.g., containing capacitors) bound for the trash. -	Yes N/A
	 Alert your school's custodial service provider to coordinate cleanout and removal of unwanted non-hazardous equipment (e.g., computer monitors/keyboards/mice, refrigerators). 	Yes N/A
	 Remove and deface all hazard stickers from to-be-discarded equipment after decontamination and attach the equipment decontamination form: ehs.harvard.edu/programs/lab-closeout-decontamination (other than radiation hazardstickers, which are removed by the Radiation Protection Office). 	Yes N/A
	 Request and confirm that your building manager arranges for certified refrigeration personnel to bleed Freon from all refrigerators and freezers bound for the trash. 	Yes N/A
7.	Clean out dark rooms and photoprocessing or "X-omat" equipment by coordinating with service vendor to drain and move equipment. Notify EH&S that you have decommissioned photoprocessing or X-omat facilities.	Yes N/A
8.	Decontaminate chemical fume hoods using detergents typically used in the lab and, if necessary, alert EH&S and your building manager to arrange for decontamination or removal of associated exhaust ductwork (using a service contractor, as appropriate).	Yes N/A
9.	Email your department coordinator locations of any lab processes (e.g., perchloric acid distillation, acrylamide powder weighing) that possibly generated lingering hazardous residues within out-of-reach places (e.g., chemical fume hood exhaust ducts, drain lines).	Yes N/A
10.	Identify potential asbestos-containing materials (e.g., lab ovens, door gaskets, wire gauze, heat mitts) to be tested prior to disposal. Contact EH&S if you have any questions.	Yes N/A
G. CI	OSEOUT	
	crange for final occupational health exam if medical surveillance has been required for lab personnel.	Yes N/A
	collapse uncontaminated, unwanted cardboard boxes for recycling. Alert Custodial Services when bundled cardboard is readyfor removal.	Yes N/A

3.	Collect all extra EH&S supplies , e.g., hazardous waste labels/containers, biohazard bags/boxes, radiation tags/labeling tape, etc. Alert EH&S and leave these supplies in a conspicuous place for pickup.	☐ Yes
4.	Ensure that lab is "broom clean" by checking each drawer, cabinet, furniture, under sinks, etc. (e.g., no pipette tips or other debris remaining).	☐ Yes ☐ N/A
5.	Conduct a final walkthrough to ensure that the lab is completely empty, with the exception of furniture such as filing cabinets and chairs.	☐ Yes ☐ N/A
6.	Confirm your department has Hep B records.	☐ Yes ☐ N/A
7.	Remove all door signage and placards when lab is vacated and allhazardous materials have been removed.	☐ Yes ☐ N/A
8.	Keep the doors to the idle lab locked , ideally with changed locks, so others are prevented from abandoning their unwanted equipment and chemicals there.	☐ Yes
9.	Post the Moveout Sign-off Sheet at the lab entrance once this checklist is completed. Coordinate a final walk through with EH&S and the facilities manager.	☐ Yes

Contact Information:

Facilities & Building Management

FAS/SEAS Building Managers
HMS/HSDM Operations: 617-432-1901
HSPH Operations Office: 617-432-1152

Environmental Health and Safety

Lab Safety Advisor or lab safety@harvard.edu

Radiation Protection: 617-436-3797 or radiation_protection@harvard.edu

Cambridge/Allston EH&S: 617-495-2060

Longwood Medical Area EH&S: 617-432-1720

Attachment MO-3 Longwood Laboratory Moveout or Renovation Sign-off Sheet

Instructions to Research Operations Manager (ROM) or Lab Safety Coordinator (LSC): Ensure that approvals from all applicable parties are indicated on this form (by their signature or your initials if you receive oral or email approval from them), and post the signed form at the main entrance to this laboratory. No construction or renovation work may begin until this form is signed and posted.

		ROOM INFO
Building:	Room #:	Use:
Principal Investigato	or: Name:	Tel:
Lab Move Coordinate	tor: Name:	Tel:
ROM (HMS/HSDM)) or LSC (HSPH): Name:	Tel:
	scribe what work needs to be performed and r plan indicating extent of work:	what subset of equipment and surfaces need to be
	Radioactivity	Physical/Sharps Electrical Pneumatic
Description:		
71 ' 1.1 Y		PRINCIPAL INVESTIGATOR
environmental healtl	Harvard Laboratory Moveout or Renovation of hand safety responsibilities related to closing Lab Move Coordinator to, on my behalf, imp	g out or moving out of a lab at the Harvard Campus, and
Signature:	Name:	Date:
		LAB MOVE COORDINATOR
I have implemented	all applicable steps identified on the Harvard	Laboratory Moveout or Renovation Guidelines.
Signature:	Name:	Date:
Applicable		HAZARDOUS WASTE TECHNICIAN
I have removed all ha	azardous chemical waste containers that hav	e been properly labeled with a Hazardous Waste tag.
I have removed all ha	azardous chemical waste containers that hav	
I have removed all ha	azardous chemical waste containers that hav	e been properly labeled with a Hazardous Waste tag. Date:
I have removed all has Signature: Applicable	azardous chemical waste containers that have Name: Not Applicable	e been properly labeled with a Hazardous Waste tag. Date: RADIATION PROTECTION OFFICE
I have removed all has Signature: Applicable	azardous chemical waste containers that have Name: Not Applicable	e been properly labeled with a Hazardous Waste tag. Date:
I have removed all has Signature: Applicable Lab decommission terminated.	azardous chemical waste containers that have Name: Not Applicable oning/termination survey has been completed	e been properly labeled with a Hazardous Waste tag. Date: RADIATION PROTECTION OFFICE
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I have removed all has Signature:	Not Applicable In the surveyed and cleared for renovation is many surveyed and surveyed an	RADIATION PROTECTION OFFICE d and license to use radioactive materials in this lab is arked on the floor plan attached to this form. Date: BUILDING MANAGER d closed out if appropriate (leaving hoods on if needed
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I have removed all has Signature:	Not Applicable In the surveyed and cleared for renovation is many surveyed and sur	RADIATION PROTECTION OFFICE d and license to use radioactive materials in this lab is arked on the floor plan attached to this form. Date: BUILDING MANAGER d closed out if appropriate (leaving hoods on if needed Date: Date: