Title: Comprehensive Asset Tracking and Environmental Release Program (CATER)

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General: Materials relocated to surplus sold to the general public may have hazardous characteristics that may present a health hazard to those who come into contact with them.

This document establishes guidelines to ensure that potentially hazardous materials released to the general public are either remediated prior to relocation, or disclosed to the buyer at the time of purchase.

Surplus Procedure Guidelines

Notification:

Surplus transfer request for all equipment can be made filling out the online form located at the following link: http://hotworks.uth.tmc.edu/stoef/default.asp

Note: Items ready for surplus should be stored in compliance with UT-Houston’s Hallway Clearance Policy.

Equipment Inspection:

Environmental Health & Safety personnel will travel to the location to inspect potentially hazardous equipment that is to be relocated to surplus. Prior to relocation, the department transferring the equipment must ensure that the equipment has been properly decontaminated, cleaned, or drained of water. Environmental Health & Safety personnel will conduct a confirmatory survey to ensure the equipment has been sufficiently decontaminated. Upon completion of confirmatory survey, any warning labels will then be removed and the person conducting the survey will affix a green CATER tag with the date inspected and his/her initials to the piece of equipment near the UT Tag or serial number. In addition, equipment such as centrifuges and refrigerators will be sealed with an appropriate label to prevent reuse before transfer to surplus.

Transfer to Surplus:

Once Environmental Health & Safety personnel have inspected the equipment, a copy of the transfer of equipment from will be forwarded to Capital Assets Management by EH&S personnel. Capital Assets Management will then be responsible for scheduling and moving the
equipment from the laboratory or office location to the surplus warehouse.

Note: equipment moved intra or interdepartmentally does not require inspection by EH&S.

**Training Guidelines:**

Personnel involved in the process of moving equipment from areas located on UTHSC-H properties to surplus should undergo a training class on regular basis. This training class will include the following topics:

a. Identification of hazard labels  
b. Identification of potential hazards  
c. Identification of regulated equipment  
d. UT requirements for relocation of equipment

**Definitions:**

**Inherently Hazardous Characteristic Material:** Materials that are potentially hazardous to persons who come into contact with them. Items in this category include equipment that contains a hazardous substance or regulated material that is a functioning part of the equipment. This includes but is not limited to the following list: Radioactive Materials; Hazardous Chemicals; Biological Materials; Pharmaceuticals; Asbestos containing materials (furnaces, safety cabinets); Light Ballasts; Smoke Detectors; Gas Chromatograph; Liquid Scintillation Counters; Gas Cylinders

**Hazardous Characteristic Added Material:** Equipment or materials that through the process of utilization have come into contact and have been potentially contaminated with chemical, biological, or radioactive substances above regulatory limits, or have been altered in such a manner as to potentially cause harm to the user. This includes but is not limited to the following: Titrators; Freezers/Refrigerators; Centrifuges; Chemical Fume Hoods; Biological Safety cabinets; Modified equipment; Incubators; Laboratory ovens; Cell harvesters; Vacuum systems; Water baths; Gel electrophoresis units; Microplate readers; Blenders/mixers; Pumps; Autoclaves.

**Distressed Medical Device:** Distressed Medical Devices are instruments, apparatus, or contrivance used in the diagnosis, cure mitigation, treatment, or prevention of disease in humans that has lost its label or is otherwise unidentified, been subjected to prolonged or improper storage, to abnormal environmental conditions, or may have been rendered unsafe for human consumption or use.

**Chemical Laboratory Apparatus:** An apparatus is any chemical laboratory equipment designed, made, or adapted to manufacture a controlled substance or a controlled substance
analogue. The following items are listed in the Health and Safety Codes Chapter 481.080 and are regulated as Chemical Laboratory Apparatus:

**Laboratory Apparatus**

A. Condensers  
B. Distilling Apparatus  
C. Vacuum Driers  
D. Three Neck Flasks  
E. Distilling Flasks  
F. Tableting Machines  
G. Encapsulating Machines  
H. Filter Funnels, Buchner  
I. Funnels, Separatory Funnels  
J. Erlenmeyer Flasks, Two-Neck  
K. Flasks, Single Neck Flasks,  
L. Round Bottom Flasks, Florence Flasks, Thermometer Flasks, Filter Flasks  
M. Soxhlet Extractors  
N. Transformers  
O. Heaters  
P. Heating Mantels  
Q. Adaptor Tubes

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**Equipment Handling Procedures:**

Materials or equipment that has **INHERENTLY HAZARDOUS CHARACTERISTICS** described below should be handled as follows:

**Radioactive Materials, Hazardous Chemicals, Biological Waste, or Pharmaceuticals** must be disposed or evaluated by the Environmental Protection Program. This can be facilitated by calling the Hazardous Waste Line at 713-500-5837.

**Liquid Scintillation Counters; Smoke Detectors; Gas Chromatograph; Balances, and other Equipment that contains radioactive sealed sources** may require the sealed source be removed prior to relocating to surplus. This **must be handled through the Radiation Safety Department** (713-500-5840) on a case by case basis. In some cases where the sealed source is allowed to remain in the instrument a buyer’s acknowledgment form will be completed by the purchaser of the equipment. All purchasers of radioactive materials will be required to have the necessary license to receive radioactive materials.

**Refrigerators/Air Conditioners containing Class I or Class II Refrigerants** a buyers
acknowledgment form will be completed by the purchaser of the equipment.

**Asbestos or Asbestos Containing Materials** will be evaluated on a case by case basis and classified by the Environmental Protection Personnel as friable or non-friable. **Friable asbestos** should be disposed by a licensed contractor coordinated by EH&S. Materials containing asbestos in a non-friable state i.e. fume hoods etc. will be relocated to surplus providing that the buyer be made aware that he/she is buying asbestos and subsequently signing a Buyer Acknowledgment form.

**Ni-CAD, nickel metal hydride, lead acid, lithium, and mercury batteries** will be recycled by the Environmental Protection Program. Alkaline and zinc carbon batteries can be disposed of through normal trash collection procedures. Batteries which are part of the equipment may be sold provided the buyer is made aware by signing a Buyer Acknowledgment form.

**Equipment containing oil** will be evaluated on a case-by-case basis. If the equipment is inoperable, the oil will be drained and recycled by the Environmental Protection Program.

Materials or equipment with a **HAZARDOUS CHARACTERISTIC ADDED** must be thoroughly decontaminated prior to relocation to surplus. The following protocol is recommended prior to relocation to surplus.

Equipment that has come into contact with **Hazardous Chemicals** should be visually surveyed to insure that it is clean. In instances where appropriate, proper instrumentation should be used to insure that there is no contamination exists.

Equipment that has come into contact with **Biohazard Materials** such as centrifuges or refrigerators should be disinfected with an EPA approved disinfectant, 10% bleach solution, or a 70% iso-propanol solution prior to relocation to surplus. Primary investigators using biological safety cabinets (BSC) for biosafety level 2 (and greater) infectious agents, particularly those that contain aerosol generating procedures, should contact a certified outside vendor to decontaminate the BSC, including the HEPA filter. Contact Biological Safety for complete risk assessment.

Equipment which has come into contact with **Radioactive Material** should be decontaminated with a decontaminant (RadCon) or a mild soapy solution and then surveyed and wipe tested to ensure compliance with **25 TAC: Surface Contamination Limits for release to an unrestricted area.**

The distribution of **Distressed Medical Devices** is regulated by the Texas Department of Health - Drugs and Medical Devices Group. Distressed medical devices can only be transferred to persons who have obtained the proper authorization to purchase or Broker Distressed Medical Devices.
The distribution of precursor/chemical/laboratory apparatus is governed by Texas Health and Safety Code Sec. 481 and the Memorandum of Understanding between the Texas Department of Public Safety and the Texas Higher Education Coordinating Board. These items cannot be transferred to businesses or to personnel that do not have a precursor/chemical/laboratory registration issued by the Texas Department Public Safety. School Districts and institutions of higher learning are exempt from the permitting process.

Any transfer or sale of precursor glassware or drugs will be documented on a DPS Nar-22 form or from created by UTHSC-H which documents the name, address, telephone number, permit number, driver license number, and date of birth of the client receiving the controlled items. This report of transfer will be submitted to the Texas Department of Public Safety within 30 day of transferring or furnishing controlled items.

**Surplus Auction:**

Prior to any surplus auction, EPP personnel will conduct a walk through inspection of the equipment being sold and identify and remove precursor chemical laboratory apparatus or drugs. A buyer’s acknowledgment form will be completed for items designated as inherently hazardous or hazardous characteristic added.

It is ultimately the responsibility of the auctioneer to ensure that those persons purchasing specific pieces of equipment have the appropriate permits/registrations to purchase either a distressed medical device or chemical laboratory apparatus.