

 <b>CSN Procedure</b>	<b>Facilities Management</b>
<b>Category: Environmental Health and Safety</b>	<b>Effective Date: 08/01/2023</b>
<b>Abandoned Material Response</b>	

**I. PURPOSE**

The purpose of this procedure describes specific actions to respond to abandoned materials located on CSN property, including identification, notification, collection, disposal, reporting, and recordkeeping.

**II. SCOPE**

Abandoned materials may include oils, fuels, or other hazardous materials including paints, compressed gases, corrosives, solvents, batteries, drug paraphernalia, etc. Abandoned nonhazardous materials may include trash, yard waste, tires, electronics, construction and demolition waste, etc. Abandoned materials may also spill or leak, affecting soil, water, and air. Prompt removal and clean-up of abandoned materials are required to minimize potential risks of personal injury, property damage, and regulatory noncompliance.

**III. OVERVIEW**

Initial identification of abandoned materials is often based on visual observations during initial discovery by CSN personnel. The protection of employees' health and safety should be of primary importance in dealing with any unknown or abandoned materials. Do not attempt to handle or move the material without proper guidance or training. Consider the possible linkage to terrorism in approaching and dealing with unknown abandoned materials which could be Chemical, Biological, Radiological, Nuclear or Explosive (CBRNE) in nature.

When dealing with abandoned materials, a wide range of situations and appropriate responses exist. For example, the situation may require a full investigation and identification by law enforcement or regulatory agencies. On the other extreme, the situation may be remedied with the safe removal and disposal of the materials or a call to the local environmental clean-up contractor who can quickly respond and remove any hazardous substances or contamination.

**V. PROCEDURE**

**A. Responsibilities**

1. Environmental Health & Safety (EHS)
  - a. Ensure administration of this procedure; conduct periodic reviews and updates.
  - b. Ensure compliance with environmental, health and safety regulations through the implementation of this procedure.
  - c. Assist directors and managers in analyzing the situation and responding appropriately when abandoned materials are encountered.
  - d. Maintain records documenting abandoned materials left on CSN properties.
  
2. Managers and Supervisors
  - a. Notify CSN EH&S and University Police Services (UPD) when CSN personnel encounter abandoned materials.
  - b. Analyze the situation with assistance from EHS to determine the requirements for continuing work and to ensure those requirements are implemented.
  - c. Determine training requirements and individuals who will be trained to perform these operations.

3. Employees
  - a. In-depth knowledge and understanding of requirements and all procedures relating to identifying and responding to abandoned materials.
  - b. Avoid contact with the material without authorization and appropriate training.
  - c. Complete assigned safety training courses.

## B. Training

CSN employees authorized to handle unknown abandoned materials on CSN properties shall be trained to perform the duties and functions assigned to each responder. All responders will be trained at the appropriate level before participating in emergency operations.

At a minimum, CSN employees shall receive the following training. Management will determine any additional training.

- a. CSN personnel shall complete hazard communication training.
- b. Employees involved with the response, handling, and management of clean-up operations shall be trained in 29 CFR 1910.120 40-Hour Hazardous Waste Operations and Emergency Response (HAZWOPER).

## C. Procedures

1. Prohibited Activities
  - a. Abandonment of materials on CSN property is prohibited.
  - b. Opening containers or packages to inspect or determine the contents without appropriate response training is prohibited.
2. Required Activities
  - a. Upon discovery, immediately report abandoned materials to Environmental Health and Safety (702) 651-7445 or University Police Services at (702) 895-3669, if after business hours (8am-5pm).
  - b. If the material is suspected of having an immediate danger to life and health (e.g., explosives, weapons, or cannot be identified), immediately notify University Police Services at (702) 895-3669.
  - c. Any material that is verified not to be an immediate danger to life and health, will be handled as abandoned materials.
  - d. If feasible and safe to do so, attempt to identify the abandoned material to determine if the material is hazardous material or not.
  - e. Attempt to identify the responsible party and/or original owner of the material, by:
    - i. Inspecting external markings or labeling on the material.
    - ii. Location relative to potential generators and access to the location.
    - iii. Asking other CSN personnel working in the area.
    - iv. Other signage in the immediate vicinity.
  - f. If the responsible party or owner is identified, the owner will be given the reasonable opportunity to claim their material for proper disposal. Lack of response may require recovery of costs from the responsible party or owner.
  - g. If the responsible party or owner cannot be identified, the person in charge will properly contain, manage, and dispose of the material by:
    - i. Controlling potential spills or release of materials.
    - ii. Assure containment, limit access and maintain security in the area, if required.
    - iii. Assure proper safe handling of the material by using the most conservative safety and management of materials.
    - iv. Determine if any state or local government reporting is necessary.
    - v. Store and dispose of the material in accordance with federal, state, and local regulations.
3. Storage and Management Requirements
  - a. Recovered abandoned materials must be properly labeled, stored, and properly disposed of.
  - b. Store drums/containers on pallets for easier inspection and detection of leaks.
  - c. Store materials indoors or cover them when stored outdoors.

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Always ensure prior to use you are using the most current copy.

- d. Ensure adequate spill clean-up supplies are stocked in the areas when transfers take place.
- e. Protect materials stored outside from exposure that could compromise containers; use overhead covers, storage cabinets, etc.
- f. Provide safeguards against accidental or intentional releases by restricting access to storage areas, implementing an inspection and maintenance program, practicing good housekeeping procedures, and using covered bins or dumpsters specially dedicated to hazardous materials.
- g. Maintain legible labels and markings on all containers and tanks.

#### **D. Records**

For every incident of abandoned materials reported on CSN properties, an incident report must be created to include the following:

1. Name of responsible party and/or owner of the material, if any.
2. List of materials found and any additional characterization data.
3. Photo documentation of the materials.
4. Completed shipping and disposal records.

#### **E. References**

##### **Phone Numbers and Emergency Responders**

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| 1. CSN Environmental Health and Safety (EH&S)                      | (702) 651-7445   |
| 2. University Police Services (UPD)                                | (702) 895-3669   |
| 3. NDEP Spill Reporting Hotline (for spills 25 gallons or greater) | 1 (888) 331-6337 |
| 4. Southern Nevada Health District Illegal Dumping Hotline         | (702) 759-0600   |
| 5. Las Vegas Metropolitan Police Department                        | 911              |