

EQUIPMENT DISPOSAL POLICY

Last updated: 9.1.2026

1. Objective & Scope

This policy defines the mandatory requirements for decommissioning, data sanitization, and disposal of all technology assets owned by the Library. It ensures compliance with federal IRS regulations, Virginia public trust laws, maximizes the lifecycle of public and donor-funded assets, and minimizes environmental impact.

This policy applies to all hardware tracking data or containing storage media owned by the Library, including desktops, laptops, tablets, servers, network infrastructure, printers, and mobile devices.

2. Decommissioning & Asset Tracking

Before any hardware leaves the premises, the IT Department must execute the following tracking steps:

- **Log Removal:** Update the central asset management database status to "Decommissioned."
- **Record Details:** Document the asset tag number, serial number, device model, and date of removal.
- **Remove Labeling:** Physically remove all library asset tags, barcodes, and identifying institutional stickers from the chassis.

3. Mandatory Data Sanitization

Protecting patron and staff data is the highest priority. No device may be disposed of, donated, or recycled without certified data destruction.

- **Storage Drives:** All hard drives and solid-state drives (SSDs) must be wiped using industry-standard software (NIST SP 800-88 compliant erasure).
- **Physical Destruction:** Drives that fail the software wipe process, or cannot be accessed, must be physically destroyed via crushing, shredding, or degaussing.
- **Configuration Clearing:** All network hardware, printers, and smart devices must be reset to factory defaults to erase saved Wi-Fi keys, configurations, and cached user data.

4. Disposal Hierarchy

The Library prioritizes resource conservation and community benefit. Decommissioned equipment must be routed through the first applicable category below:

Tier 1: Internal Reallocation

Can parts of the equipment (such as RAM, storage drives, or power supplies) be harvested to repair or upgrade other active library systems? If yes, salvage parts and stock them in IT inventory.

Tier 2: Community Donation

If the equipment is fully functional but no longer meets library performance standards, it may be donated to local registered non-profits, schools, or low-income digital literacy programs.

- Recipients must sign a "Donation Liability Waiver" stating the hardware is accepted "as-is" with no ongoing IT support or warranties provided by the Library.

Tier 3: Certified E-Waste Recycling

Hardware that is broken, obsolete, or unsafe for reuse must be sent to an electronics recycling vendor. The vendor must hold active R2 or e-Stewards certifications.

- The IT department must obtain a formal Certificate of Destruction from the vendor for every batch of equipment recycled.

5. Compliance, Ethics, and Conflict Minimization

To comply with Internal Revenue Service (IRS) regulations regarding Private Inurement and Excess Benefit Transactions ([IRC § 4958](#)), and to protect assets held in public trust under Virginia law, strict disposal rules apply to library insiders.

- **Prohibition on Private Benefit:** No decommissioned library IT equipment may be sold, gifted, or transferred directly to active employees, management, board members, or their immediate family members.
- **Public Resale Channel:** If the IT Department determines that decommissioned equipment still holds a Fair Market Value (FMV) exceeding \$100 per unit, it must be listed via an open-market public auction platform (*e.g., GovDeals or eBay*). Library employees may bid on items only through these public platforms as standard members of the general public.
- **No Trash Disposal:** No electronics may be thrown into standard trash bins or dumpsters due to environmental regulations regarding heavy metals.

6. Policy Enforcement & Review

Failure to adhere to this policy may result in disciplinary action up to and including termination. This policy will be reviewed annually by the IT Department and the Board of Trustees to ensure alignment with changing federal, state, and environmental regulations.

Approved by: _____
Title: _____
Date: _____

APPENDIX A: Equipment Donation Liability Waiver

Donor Organization: Massanutten Regional Library

Recipient Organization: _____
Recipient Contact Person: _____
Phone / Email: _____

The Recipient Organization acknowledges receipt of the computer equipment and/or peripherals listed below from Massanutten Regional Library (hereafter referred to as "the Library").

1. Equipment Transferred:

Item	Model	Service Tag/Serial #

(Attach additional asset sheets if necessary)

2. Terms and Conditions:

- **"As-Is" Condition:** The Recipient accepts all equipment in an "as-is" and "with all faults" condition. The Library makes no representations, warranties, or guarantees, express or implied, regarding the equipment's functionality, safety, or suitability for any purpose.

- **No Ongoing Support:** The Recipient understands that the Library will provide no technical support, maintenance, troubleshooting, parts, or software licensing for the transferred hardware.
- **Liability & Indemnification:** To the maximum extent permitted under the laws of the Commonwealth of Virginia, the Recipient agrees to defend, indemnify, and hold harmless the Library, its trustees, officers, and employees from any and all claims, damages, losses, liabilities, or expenses arising from the transport, use, storage, or subsequent disposal of the transferred equipment.
- **Data Sanitization:** The Library certifies that storage drives have been wiped. The Recipient agrees that it is solely responsible for installing its own operating systems and applications.
- **Responsible E-Waste Disposal:** The Recipient agrees that when this equipment reaches the end of its useful life, it will be disposed of via a certified electronic waste recycler and will not be thrown into ordinary municipal trash.
- By signing below, the authorized representative certifies that they have the authority to bind the Recipient Organization to these terms.

Recipient Authorized Signature: _____

Printed Name & Title: _____

Date: _____

APPENDIX B: Asset Deletion and Sanitization Log

This log must be completed by the IT Department and retained for compliance auditing before hardware leaves library property.

1. Asset Profile:

Item: _____

Make/Model: _____

Serial #: _____

Service Tag: _____

Approx. Purchase Year: _____

Notes: _____

2. Decommissioning Checklist: *(Initials Required)*

- Asset database status updated to "**Decommissioned**" (Initials: _____)
- All library-identifying stickers and asset tags **physically removed** (Initials: _____)

3. Data Sanitization Details:

- **Software Wipe:** Drive wiped using NIST SP 800-88 compliant software.
- *Software Tool Used:* _____ *Date Completed:* _____
- **Physical Destruction:** Drive was structurally failed, inaccessible, or un-wipe able and was physically destroyed (crushed/shredded).
- *Method of Destruction:* _____ *Date Completed:* _____
- **Configuration Clear:** Motherboard BIOS, printer NVRAM, or network configurations reset to factory defaults. (Initials: _____)

4. Final Disposition Route:

- **Tier 1:** Parts harvested for internal inventory.
- **Tier 2:** Donated to outside organization *(Requires signed Appendix A attached)*.
- **Tier 3:** Dispatched to certified E-Waste vendor.
- *Vendor Name:* _____ *Certificate of Destruction #:* _____

5. Sign-Off Authorization:

IT Director / Management Approval: _____

Printed Name: _____ Date: _____

APPENDIX C: Technology Asset Disposal and Risk Mitigation

Purpose and Operational Necessity:

As a non-profit organization operating within the Commonwealth of Virginia, the Library holds its physical and digital assets in public trust. This Technical Equipment Disposal Policy establishes a legally compliant framework for decommissioning, sanitizing, and disposing of retired IT hardware.

Protection of Tax-Exempt 501(c)(3) Status:

The Internal Revenue Service (IRS) strictly monitors how tax-exempt organizations handle the disposition of property. Without a formalized, board-approved policy, the informal distribution or discounted sale of used equipment to insiders—such as employees, management, or board members—presents severe regulatory risks:

- **Prevention of Private Inurement and Excess Benefit Transactions ([IRC § 4958](#)):** IRS regulations prohibit charitable assets from benefiting private individuals who hold institutional influence. This policy implements an absolute ban on direct insider sales or gifts, completely eliminating the risk of steep federal excise tax penalties (ranging from 25% to 200%) on individuals and a 10% penalty on board members who approve such transactions.
- **Maintenance of Public Trust Under Virginia Law:** In Virginia, assets purchased with donor funds or state aid are legally protected for public benefit. This policy establishes a transparent "Disposal Hierarchy" prioritizing internal reuse, verified community donation to external non-profits, or open public auctions (such as GovDeals/Ebay), ensuring the Library remains beyond reproach regarding self-dealing or favoritism.

Data Privacy and Environmental Compliance:

In addition to financial protections, the policy enforces strict compliance with state and federal data privacy standards by mandating NIST SP 800-88 compliant data destruction for all media. This shields the Library from liabilities associated with data breaches of patron or staff records. Finally, by mandating the use of certified R2 or e-Stewards electronic recyclers, the policy guarantees compliance with environmental laws governing hazardous electronic waste, protecting the Library from environmental litigation and fines.