

# CSU Chemical Inventory Maintenance Program & DHS Notifications of Chemicals of Interest



Purpose: Detail procedures to be implemented at Cleveland State University to maintain chemical inventories and submit required notifications to the U. S. Department of Homeland Security (DHS) in accordance with the Chemical Facility Anti-Terrorism Standards (CFATS) program.

## 1. PI/ Supervisor Responsibilities

- a. PI/Supervisors are responsible for maintaining up-to-date chemical inventories in the Chemical Inventory Spreadsheet by clicking [here](#). The Chemical Inventory must be completed minimally on an annual basis.
- b. Prior to filling out the Chemical Inventory spreadsheet PI/Supervisors shall receive training from Environmental Health and Safety (EHS).
- c. A completed chemical inventory shall be available for review during laboratory inspections conducted by EHS.
- d. If a laboratory is known to possess a DHS Chemical of Interest in a quantity that meets or exceeds the standard threshold quantity (STQ), the PI/Supervisor is required to notify EHS immediately. The list of Chemicals of Interest and their associated STQ's can be found at the following link: <https://www.dhs.gov/appendix-a-chemicals-interest-list>
- e. For assistance filling out the chemical inventory and questions regarding Chemicals of Interest, contact EHS at (216) 523-7588.

## 2. Office of Environmental Health and Safety (EHS) Roles

- a. On a monthly basis, Office of Environmental Health & Safety Chemical Security personnel will review chemical inventories in the EHS chemical inventory spreadsheet to identify DHS Chemicals of Interest possessed by the university and determine whether or not the Chemicals of Interest are at or above the STQ. When the inventory indicates a facility possesses a COI  $\geq$  STQ, EHS will contact the responsible PI/ Supervisor to verify this information.
  - i. EHS will verify chemical procurement requests by reviewing MagnusMart and submitted chemical procurement sheets via CSU purchasing systems.
  - ii. EHS will contact the responsible PI/ Supervisor to verify this information
  - iii. Once verified, EHS will physically inspect the COI location.
    1. After verifying possession of a reportable quantity, EHS is required to submit a Top-Screen Survey to DHS to report the possession of a COI  $\geq$  STQ.
    2. EHS will facilitate training for required persons in accordance with the CFATS program detailed in 6 CFR 27.400(e).
    3. EHS will submit all correspondence requested by DHS for the facility, e.g., Security Vulnerability Assessment and Site Security Plan or Alternate Security Program.
    4. EHS will submit a Top-Screen to DHS within 60 days of when a facility makes materials modifications to its operations. EHS will submit a Top-Screen to DHS when a facility no longer possesses COI  $\geq$  STQ..