



## **Chemical Procurement Program**

# **The Office of Environmental Health and Safety Purchasing**

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## **I. Program Scope**

The purpose of this procedures contained in this program is to ensure that compliance issues promulgated by applicable regulatory agencies are considered and addressed before a chemical material is procured. These agencies include but are not limited to the Environmental Protection Agency (EPA), Department of Homeland Security (DHS) and the Occupational Safety and Health Administration (OSHA) through Ohio's Public Employment Risk Reduction Program (PERRP). The compliance issues the program addresses is to establish a procurement process that identifies regulated chemicals prior to acquisition, provides authorization for procurement of these chemicals, and that tracks the chemicals from the time they are purchased until received and inventoried. The Chemical Procurement Program applies to all employees who purchase chemical/hazardous materials

## **II. Definitions**

**(A) Authorized Individual:** Person within a department or college who has received the necessary training, and is authorized to review and approve hazardous materials procurement requests. Departments and colleges are to identify an individual to fulfill this role. The Authorized individual may or may not be the same departmental employee responsible for processing actual purchase requisitions or orders of chemicals.

**(B) Chemicals:** For the purposes of this procedure, chemicals are defined as solid, liquid or gaseous substances (including compressed gases, which are identified as having hazardous properties (flammable, corrosive, reactive, toxic, health, carcinogen) by their manufacturer.

**(C) Material Safety Data Sheet (MSDS):** Product safety and handling information supplied by the product manufacturer. It is a requirement of the OSHA Hazard Communication Standard that a copy of a chemical's MSDS be made available to any person working with or around a hazardous material.

**(D) Screening Threshold Quantity:** the amount of a chemical, identified as a chemical of interest in the Chemical Facility Anti-Terrorism Standards - Appendix A, above which facilities are required to report to the Department of Homeland Security within sixty (60) days

## **III. Chemicals Applicable to the Chemical Procurement Program**

The list of chemicals requiring tracking and pre-approval prior to ordering can be found in Appendix B

## **IV. Exemptions to the Chemical Procurement Program**

Radioactive materials (addressed in the University's Radiation Safety Program), amino acids, biological agents and buffer solutions, biological growth media, proteins, nucleic acids, digestible sugars (-ose) and non-digestible sugars (-ol), tissue culture supplies, various salts as identified in Appendix C, and general consumer products (those that do not require Material Safety Data Sheet) are excluded from this procedure.

## **V. Responsibilities**

**Authorized Individuals:** Responsible for reviewing all hazardous material requisitions to ensure applicable compliance issues have been addressed prior to purchase, and documentation of authorization to procure a chemical for their department.

**Chemical Requestor:** Responsible for ensuring all requests submitted for chemical purchase are appropriate and in accordance with the mission of the University for academic and research use. Only University employees are permitted to request procurement of chemicals.

**Departments and Colleges:** Responsible for ensuring these procedures are followed in their department or college. Also must ensure that there are an adequate number of Authorized Individuals to prevent excessive delays when hazardous materials are requested.

**Environmental Health & Safety:** Responsible for program development, maintaining the list of Authorized Individuals and providing training and support for these individuals. Will also maintain and monitor the effectiveness of the program through periodic performance assessments.

**Purchasing:** Monitor all mechanisms for chemical and hazardous material procurement (PeopleSoft, Procurement Card, and manual requisitions) to ensure review by an Authorized Individual has occurred.

## **VI. Training**

Authorized Individuals will be provided initial training and additional training as required. This training will cover the relevant environmental and safety regulatory issues that must be considered when reviewing a request for hazardous materials.

## **VII. Procedures**

**7.1** Procurement of chemicals/hazardous materials as defined in this program shall be in accordance with all applicable Purchasing policies. These procedures apply to any mechanism that is used to obtain a chemical/hazardous material. The methods approved for procurement are:

- University Purchase Requisition & Purchase Order
- Continuous Purchase Order
- Small Order Form

**7.2** Chemical ordering requests shall be routed to an Authorized Individual within the department or college. A list of Authorized Individuals can be found in Appendix A.

**7.3** The Authorized Individual will review the chemical request to ensure to determine if the substance to be ordered has any hazardous properties or regulatory obligations as identified in Appendix B, and ensure the impacts of procurement have been considered using the guidelines found in Section 8.

**7.4** If the Authorized Individual has concerns about a request, the concern shall be addressed to the chemical requestor. If the concern is not resolved, the Authorized Individual and/or chemical requestor should contact Environmental Health and Safety for assistance.

**7.5** Once the request has been reviewed, and any concerns addressed, the Authorized individual will document approval by placing their signature somewhere on the request form and submit the request for purchase through established departmental protocols.

**7.6** For Departments that have continuous purchase orders already issued by Purchasing to buy chemicals, the chemical requestor is to submit a Request for Chemical Procurement –Continuous Purchase Order Form (Appendix E) to the Authorized Individual to facilitate the review and authorization process.

**7.7** Purchase orders that are sent to the Purchasing Department shall be marked in a manner that indicates they have been reviewed and approved by an Authorized individual.

**7.8** If chemicals to be ordered are identified on the list of chemicals in Appendix B, correspondence to the chemical requestor shall be generated by the Authorized Individual notifying the chemical requestor of the stated hazard and any special requirements for handling, storage and reporting. Sample correspondence can be found in Appendix D. Copies of correspondence shall also be forwarded to Environmental Health and Safety.

**7.9** Environmental Health and Safety shall report any chemicals identified as chemicals of interest by the Department of Homeland Security in excess of the screening threshold quantity to the DHS.

**7.10** On a periodic basis, EH&S will audit the departmental records of purchases to ensure all hazardous materials requisitions are being reviewed by Authorized individuals.

## **VIII. Guidelines**

**8.1** Lists of chemicals that are to be consulted to determine if a chemical purchase or use would involve particularly severe hazards are found in Appendix B. Substitution or reductions of quantity are desirable

**8.2** Efforts should be made by all parties to purchase as small amount of hazardous chemical materials as possible which in turn shall prevent and/or reduce the generation of hazardous waste.

**8.3** Hazardous waste reduction begins at the source of generation. Purchases should be made and reviewed in consideration of the following:

- Purchase only the quantity of material necessary for the job at hand. Excess material and material that age past its shelf life becomes hazardous waste.
- Determine if a less hazardous material can be substituted for the same job. Suppliers often have suggestions for safer or more environmentally friendly products.
- Determine if a reusable or recyclable material can be used for the same job.
- Contact Environmental Health and Safety for any questions or additional reference materials.

## **IX. References**

Department of Homeland Security (DHS) 6 CFR

Environmental Protection Agency (EPA) 40 CFR

Occupational Safety and Health Administration (OSHA) 29 CFR 1910 – Table Z2

International Agency for Research on Cancer (IARC)

Appendix A

List of Authorized Users

Name of Authorized Individual	College/Department	Office/Phone#	Date Effective

## Appendix B

Insert List of Chemicals Applicable to the Chemical Procurement Program



## Appendix C

(Insert List of Chemicals Exempt from Chemical Procurement Program)

Appendix D

Sample Correspondence to Chemical Requestor

TO: \_\_\_\_\_, Chemical Requestor

FROM: \_\_\_\_\_, Authorized Individual

DATE: \_\_\_\_\_

SUBJECT: Chemical Purchase Request – (Insert PO#’s, order numbers, reference #s)

Following review of your request for chemical purchase, it has been determined that the specific chemical(s) (List chemicals - if multiple chemicals – you may attach a separate sheet):

_____	_____
_____	_____
_____	_____
_____	_____

To be used in (Insert Building/Room Number) have been determined to present one or more of the following regulatory issues:

- Chemical is considered a Chemical of Interest by the DHS
- Chemical is considered Acutely Hazardous by the EPA (P-List)
- Chemical is considered a Listed Hazardous Compound by the EPA (U-List)
- Chemical is considered Toxic by the EPA (D-List)
- Chemical is considered a Hazardous Substance by the EPA
- Chemical is considered Ignitable
- Chemical is considered Corrosive
- Chemical is considered Reactive
- Chemical is considered Water-Reactive
- Chemical is a Known Carcinogen by the IARC

Please take care to follow applicable laboratory safety storage and handling guidelines.

cc: Environmental Health and Safety

Appendix E

Request for Chemical Procurement – Continuous Orders

Chemical Requestor \_\_\_\_\_ Date \_\_\_\_\_

Laboratory Location (Building/Room) \_\_\_\_\_

I request procurement of the following chemicals (if multiple chemicals – you may attached a separate sheet):

<u>Chemical Name</u>	<u>Order #</u>	<u>Quantity</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Vendor \_\_\_\_\_ Continuous Purchase Order# \_\_\_\_\_

Signature of Chemical Requestor \_\_\_\_\_

Authorized Individual Approval \_\_\_\_\_  
Signature Date