



Chemical Procurement Program

Office of Environmental Health and Safety Purchasing

2018

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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
- Magnus mart

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.

DEPARTMENT OF THE TREASURY
ALCOHOL AND TOBACCO TAX AND TRADE BUREAU
INDUSTRIAL ALCOHOL USER PERMIT

PERMIT NUMBER

TFOH-754

EFFECTIVE DATE

NOVEMBER 1, 1965

Board of Trustees for Cleveland State University

Biology Department	Health Sciences	Chemistry Department
2399 Euclid Avenue	2501 Euclid Ave.	2351 Euclid Ave.
Cleveland, OH 44115	Cleveland, OH 44115	Cleveland, OH 44115

MAXIMUM QUANTITY TO BE WITHDRAWN PER CALENDAR YEAR

360

SHIP-TO ADDRESS: 1802 E. 25th ST. CLEVELAND, OH 44115

DGALLONS 8) PROOF GALLONS

You are hereby authorized to:

<input checked="" type="checkbox"/> Withdraw and use alcohol free of tax	<input type="checkbox"/> Withdraw and use specially denatured alcohol/rum
<input type="checkbox"/> Recover/restore alcohol free of tax	<input type="checkbox"/> Withdraw and deal in specially denatured alcohol/rum
	<input type="checkbox"/> Recover/restore alcohol/rum

Operations must be conducted at the above address, subject to applicable law and regulations, the Federal Water Pollution Control Act and to the conditions set forth below.

This permit is continuing and will remain in force unless suspended, revoked, voluntarily surrendered or automatically terminated.

This permit is not transferable. In the event of any lease, sale or other transfer of the operations authorized or of any other changes in the proprietorship of such operations, this permit shall automatically terminate unless the successor qualifies by the end of thirty days. If a timely application is filed, the outstanding permit will continue in effect until the application is acted upon by the National Revenue Center or Puerto Rico Operations Office.

Tax free alcohol may not be used for any purpose or in any manner not shown on an approved permit application.

THIS PERMIT IS SUBJECT TO THE FOLLOWING CONDITIONS:

GENERAL CONDITIONS

1. That the permittee complies with the provisions of **U.S.C.** Chapter 51 and its regulations.
2. That the permittee has made no false statement as to any material fact in its application for this permit.
3. That the permittee furnishes all the material information required by law and regulations.
4. That the permittee and all persons interested in the permitted operations shall not violate or conspire to violate any law of the United States relating to intoxicating liquor and shall not be convicted of any offense under the United States Code punishable as a felony or of any conspiracy to commit such an offense.
5. That the permittee continues, by reasons of operations, to be warranted to procure, possess and dispose of/use, as the case may be, specially denatured alcohol/rum or alcohol free of tax.
6. That the permittee timely prepares and maintains at the address stated on this permit, adequate and accurate records and reports as required by 26 U.S.C. 5275 and its regulations, and makes timely, true and complete reports of operations as required by law and regulations.
7. That the permittee has not discontinued the operations authorized by this permit for a period exceeding two years.

SPECIFIC TAX FREE CONDITIONS

That the permittee uses alcohol withdrawn free of tax only for the purposes set forth in this permit and within the conditions and limitations specified in 26 U.S.C. 5214 (a)(2) or (3).

SPECIFIC SPECIALLY DENATURED ALCOHOL/RUM CONDITIONS

1. That the permittee shall use specially denatured alcohol/rum in the manufacture of an article in accordance with an approved formula (including any general use formulas). When using specially denatured alcohol, for laboratory or mechanical purposes, not in the development of a product, use in the manner provided by law and regulations.
2. That the permittee manufactures, labels, advertises and sells or uses articles in the manner provided by law and regulations.
3. That the permittee, if authorized by this permit, recovers completely denatured alcohol, specially denatured alcohol/rum, or articles, in accordance with approved statements of process, in the manner provided by law and regulations.
4. That the permittee shall not dispose of specially denatured alcohol/rum to a user without a valid copy of the user's permit.

THIS IS AN

ORIGINAL PERMIT

AMENDED PERMIT

REASON FOR AMENDMENT (Type in plain language)

Change in premise addresses and adding of ship-to address

DATE OF AMENDMENT

AUG 29 2007

7

SIGNATURE AND TITLE OF AUTHORIZED OFFICIAL

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)

HAZARDOUS CHEMICAL PROCUREMENT AUTHORIZATION FORM

Chemical Name: _____ CAS Number: _____

Unit Size: _____ Quantity: _____

Requestor: _____ Date: _____

Department: _____

Building/Room Number: _____ Magnus Mart PO Number: _____

- 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
- Chemical is considered an OSHA hazard

All listed chemicals require tracking of quantities and disposal; take care to follow applicable laboratory safety storage and handling guidelines.

The requested Purchase is:

___ Approved, and the order may be placed ___ Denied, Pending further information

Comments: _____

Required Signatures and Stamps:

_____: Date: _____

Chemical Procurement
Authorized Individual

_____: Date: _____

EHS Authorized Individual

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..