



Chemical Procurement Program

Office of Environmental Health and Safety

Purchasing

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I. Program Scope

The purpose of the procedures contained in this program are 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: 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 approved 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) Safety Data Sheets (SDS)** – 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 SDS be made available to any person working with or around a hazardous material.
- (D) Screening Threshold Quantity (STQ)** – The amount of a chemical, identified as a chemical of interest in the Chemical Facility Anti-Terrorism Standards (CFATS) appendix A, above which facilities are required to report to DHS within sixty (60) days.

III. 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, and general consumer products (those that do not require an SDS) are excluded from this procedure.

IV. 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. 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 and Safety – Responsible for program development, approving chemical procurements via available purchasing programs, tracking quantities and locations of chemicals, and conducting a campus wide chemical inventory on an annual basis.

Purchasing – Monitor the mechanisms for chemical and hazardous material procurement (PeopleSoft, Procurement Card, MagnusMart, and manual requisitions) to ensure review by an Authorized Individual.

V. Training

Employees who are in the chemical procurement approval chain, or who will be conducting the campus wide chemical inventory are required to successfully complete the CSU Laboratory Safety Fundamentals course, and the DHS Chemical Terrorism Vulnerability Information (CVI) training.

VI. Procedures

(A) 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 Form
- Short Order Form (SOF)
- MagnusMart approved commodity codes are: CHML, CHMN, GASC, LABT

(B) The department representative filling out the Chemical Procurement Form shall

review the request to determine if the chemical exhibits any characteristics listed on Appendix A. EHS will review the procurement to determine if the chemical purchased is a DHS Chemical of Interest.

- (C) If a department representative has a concern about a chemical request, the concern shall be addressed to the chemical requestor. If the concern is not resolved, the representative and/or the chemical requestor shall contact EHS for assistance.
- (D) Once the request has been reviewed and any concerns addressed, the department representative will document approval by placing their signature on the Department Representative line and submit the request for purchase through established departmental protocols.
- (E) Purchase orders that are sent to the Purchasing Department shall be marked in a manner that indicates they have been reviewed and approved by EHS.
- (F) EHS shall report any chemicals identified as Chemicals of Interest by DHS in excess of the Screening Threshold Quantity to the Department of Homeland Security (Appendix B).
- (G) On a periodic basis, EHS will audit the departmental records of purchases to ensure all hazardous materials requisitions are being ordered in compliance with the Chemical Procurement Program.

VII. Guidelines

- (A) 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.
- (B) Hazardous waste reduction begins at the source of generation. Purchases should be made and reviewed in consideration of the following:
 - Purchase on the quantity of material necessary for the job at hand. Excess material and materials that age past its shelf life become 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 EHS for any questions or additional reference material.

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

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 exhibits a recognized hazardous characteristic (toxic, ignitable, corrosive, reactive) per the EPA

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

Appendix B

Chemical Inventory Maintenance and 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.