



Chemical Inventory Control Guideline

Office of Environmental Health and Occupational Safety

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I. Scope

The control and management of chemicals and other potentially hazardous materials is the responsibility of everyone, and anyone involved in their acquisition, use and or disposal. City College – CUNY is required to comply with a number of local Federal and state regulations related to the purchase, use and storage of chemicals.

Regulations require that the college provide an inventory of potentially hazardous materials to appropriate federal and local agencies. In addition, the Chemical Facility Anti-Terrorism Standards regulations require that chemicals entering the college are managed and tracked in a manner to ensure accountability for all items of interest. To facilitate this process, CUNY has implemented the SafetyStratus LabCliQ inventory management module.

II. Objectives

- Provide an inventory of chemicals through the maintenance of a standard inventory system
- Allow for access and manipulation of the inventory system by lab personnel and staff
- Provide a method of waste reduction and controlling disposal cost
- Provide an immediate snapshot of the chemical inventory for the purpose of emergency response
- Track chemicals for compliance purposes and provide a means of tracking inventory levels for compliance with the Chemical Facilities Anti-Terrorism Standard (CFATS).

III. Purpose

The City College of New York – CUNY is committed to provide a safe environment for faculty, students and staff. The management of hazardous materials is crucial to the continued function of all responsible departments, in order to facilitate compliance with all regulatory mandates related to the use and storage of hazardous materials.

Maintaining a current chemical inventory that is available to personnel within a lab also allows for better resource management and accountability for wastes, reduces the possibility of excessive accumulation, and prevents individuals from retaining materials after expiration.

IV. Applicability

The policy is applicable to all departments that use or store hazardous materials at CCNY. This includes but is not limited to the Division of Science, the Grove School of Engineering, the Sophie Davis School of Biomedical Sciences and the Center for Discovery and Innovation.

All departments using or storing potentially hazardous materials must maintain an updated inventory of these materials. Hazardous materials include chemicals, chemical waste, cleaning materials, fuel oil, paints, oils and other similar items that are present on campus.

V. Definitions

While all chemicals should be documented as part of a laboratory or department's chemical inventory upon receiving them, hazardous chemicals and materials are especially important to keep track of.

Hazardous materials are defined in 49 CFR, Department of Transportation and 29 CFR 1910.120, Occupational Safety and Health Administration (OSHA) as any substance that is either a "health hazard" or "physical hazard."

Health hazards include materials that are carcinogenic, toxic, skin or eye irritants, skin sensitizers, corrosive to the skin or eye, teratogenic, or otherwise harmful to the lungs, skin, eyes, or mucous membranes.

Physical hazards are materials that are flammable, combustible, explosive, oxidizers, pyrophoric, highly reactive or water-reactive, and/or may release dusts or gases under the course of normal use and storage.

The EPA expands upon these definitions in 40 CFR 261; a hazardous material is also any item or chemical which may cause harm to people, plants or animals when released to the environment. Products and chemicals that have properties that pose one or more health or physical hazards will be marked as such on corresponding Safety Data Sheets (SDS) provided by the manufacturer.

VI. Requirements

Every department that orders, stores or uses chemicals must provide a standardized chemical inventory annually. The chemical inventory report is required to be submitted to the office of Environmental Health & Safety by January 21st of each year, unless it is kept current in the LabcliQ system, in which case it will already be retrievable by EHOS.

This inventory will be used to complete and file the annual Tier II report with the NYC Department of Environmental Protection.

VII. Responsibility

The department inventory must contain the material name, location (room or laboratory), building name, the unit container size of the material on hand, the number of containers and the expiration date of the material, if any.

Individuals in the Division of Science, School of Engineering and Sophie Davis School of Biomedical Sciences are encouraged to utilize the LabcliQ chemical inventory system.

All laboratory personnel must ensure that the chemical inventory is kept up to date. The department head must ensure that inventories are current by February 1st of each year.

VIII. Key Elements

- Receiving New Chemicals
- Opening Chemical Containers
- Emptying Chemicals
- Relocating Chemicals
- Verifying Chemical Inventory

IX. Procedure

1. Receiving New Chemicals

- a) All new chemicals must be entered into the SafetyStratus LabCliQ inventory system.
- b) **Determine the appropriate storage location using the safety data sheet (SDS).**
- c) File SDS in the SDS binder, or if a newer SDS is available, replace the old one.

2. Opening New Chemicals

- a) Record the date when the chemical is opened on the container. Record the expiration date on the container if appropriate.

3. Emptying Chemicals

- a) Empty chemical containers should be treated as hazardous chemical waste unless:
 - i. All chemical residues have been removed
 - ii. The container is rinsed three (3) times with a compatible solvent
- b) "Triple-rinsed" containers can be discarded in municipal trash/recycling or used again to store compatible chemicals.
- c) Containers used to store oil or ethidium bromide gels cannot be rinsed and must be treated as waste.
- d) Containers used to store acutely toxic chemicals or other acute waste (designated as "P-listed hazardous waste") cannot be triple-rinsed and must be treated as hazardous waste.
- e) Remove any discarded chemicals from the chemical inventory system.

4. Relocating Chemicals

- a) When a chemical is moved, record the new location and update the chemical inventory system with the new location.

5. Verify Inventory

- a) The designated person will update the SafetyStratus LabCliQ inventory.
- b) Visually inspect chemicals for signs of deterioration and past expiration dates.

- c) Remove all expired chemicals.
- d) Correct any errors on the inventory system.