AMERICAN UNIVERSITY WASHINGTON, D.C.

University Policy: Inventory Requirements for Chemicals Used in Teaching and Research

Policy Category: Research, Risk Management, Environmental Health and Safety

Subject: Inventory of chemicals used in teaching and research

Office Responsible for Review of this Policy: Risk Management and Safety Services

Procedures: Procedures for chemical receiving, tracking and disposal incorporated in this policy

Related University Policies: Chemical Hygiene Plan; OSP: Principal Investigator's Handbook

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I. SCOPE

This policy sets forth inventory and labeling requirements for all chemicals brought onto university property to be used in teaching and research. The purpose of this policy is to establish a process for chemical receipt, tracking, and disposal.

II. POLICY STATEMENT

In order to conduct research in a responsible and safe manner, an accurate chemical inventory of each laboratory must be kept. A chemical inventory allows the university to monitor sensitive materials, conduct emergency planning, and disseminate reports to regulatory agencies as required under federal law.

III. DEFINITIONS

Teaching or research chemical: A compound or substance used in a research or teaching laboratory that meets OSHA's criteria of a hazardous chemical. This is any chemical which may pose a physical or health hazard and which the manufacturer is required to label in accordance with OSHA's adaptation of the Globally Harmonized System.

Receipt: The moment at which a teaching or research chemical is transferred from the control of an external agency to an AU-affiliated entity. Most commonly, this is the moment of package delivery, or transfer of an item from a vehicle or other transport vehicle onto American University property.

Disposal: Relinquishment of control of any compound or substance at the end of the product's useful life.

IV. POLICY

All teaching or research chemicals brought onto university property must be barcoded and entered into the university's chemical inventory system upon initial receipt. Each chemical container must be labeled with a unique barcode number, provided by Risk Management and Safety Services. Chemical bottles without barcodes will be subject to removal until the required information is entered into the inventory system.

Principal Investigators (PIs) are ultimately responsible for ensuring that chemical containers under their control have been barcoded and entered into the inventory at the time of receipt.

V. PROCEDURE

Chemical Receiving

1. Log in to the Environmental Health and Safety (EH&S) Sharepoint site at https://myau.american.edu/dept/Treasurer/RMS/EHSResources/Lists/Chemical%20Receiving/AllItems.aspx
   Note: Your credentials must be added to the permissions list before you can access this site. Contact Risk Management if you need your permissions to the site updated.
2. Click "Add new item" and complete the Chemical Receiving Form.
3. Click "Submit" at the bottom of the form to send the new data to the inventory.
4. Ensure that the barcode number you entered on the Chemical Receiving Form matches the pre-printed barcode label (supplied by EH&S) you are about to apply.
5. Remove the paper backing from barcode label and adhere it to the clean, dry chemical container. If the chemical container is too small for the chemical label, attach it to a tag and tie the tag around the neck of the container.

Chemical Disposal

To dispose of a chemical container, there are three options:

1. Place the empty container, with barcode intact, in the hazardous waste accumulation area. If the container holds waste product, also affix a hazardous waste label.
2. Peel the barcode label off of the container and place the label in the waste accumulation area.
3. Write the barcode number on the designated calendar in the waste accumulation area and deface the barcode on the container.

EH&S will remove items placed in the waste accumulation area from the inventory on a weekly basis.

Annual Inventory Reconciliation Process

In early January of each year, EH&S sends an inventory request to each Principal Investigator in control of research chemicals. A pre-programmed spreadsheet is provided to the researcher at this time. EH&S provides the Principal Investigator with a barcode scanner to perform the reconciliation. The Principal Investigator, or their designated

representative, scans all barcoded items in his or her laboratory, populating the spreadsheet provided. The spreadsheet is submitted electronically to EH&S by mid-February. EH&S compares the provided inventory to the real-time inventory and investigates any discrepancies.

VI. EFFECTIVE DATE AND APPROVAL

Policy effective November 2015

This policy needs to be signed by the appropriate officer (listed below) before it is considered approved.

Approved: Scott Bass, November 25, 2015