

## WASHINGTON UNIVERSITY CHEMICAL INVENTORY POLICY

### POLICY STATEMENT (OVERVIEW)

In accordance with federal, state and local regulatory requirements, Washington University has committed to inventorying the amounts and locations of all hazardous materials across all campuses. Responsible parties in areas where hazardous chemicals are stored are required to maintain an accurate inventory of all hazardous materials by utilizing the university's online chemical inventory database, EHS Assistant. Responsible parties may include, but are not limited to, principal investigators, managers, supervisors, department chairs, laboratory personnel, stockroom attendants, facility staff, maintenance personnel, and others as designated by management.

### DEFINITIONS (per 29 CFR 1910.1200(c))<sup>1</sup>

"Chemical" means any element, chemical compound or mixture of elements and/or compounds.

"Chemical name" means the scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name which will clearly identify the chemical for the purpose of conducting a hazard evaluation.

"Hazardous chemical" means any chemical which is a physical hazard or a health hazard.

"Identity" means any chemical or common name which is indicated on the safety data sheet (SDS) for the chemical. The identity used shall permit cross-references to be made among the required list of hazardous chemicals, the label and the MSDS.

"Safety data sheet (SDS)" means written or printed material concerning a hazardous chemical which is prepared in accordance with paragraph (g) of this section.

"Responsible party" means someone who can provide additional information on the hazardous chemical and appropriate emergency procedures, if necessary.

### REASON FOR POLICY

The policy was adopted to outline the requirements for chemical inventory of laboratories, workshops, stockrooms, storage areas, and other university work areas. Federal, state, and local regulations require all facilities in possession of hazardous chemicals to maintain a comprehensive inventory of those items. Due to the hazardous nature of the substances, the list can help emergency personnel to plan before responding to an emergency, which minimizes injuries and damage to property. In addition to safety concerns, the lists help Environmental Health and Safety (EHS) and University Administration to recognize when certain chemical, such as Class 1A Flammables or DHS Chemicals of Interest, are nearing the allowable inventory limit before the item becomes a compliance issue.

---

<sup>1</sup> Additional definitions can be obtained in the Hazard Communication Standard (29 CFR 1910.1200)

The following excerpts from OSHA's Hazardous Communication Standard and EPA's Protection of Environment regulation illustrate our responsibility to maintain chemical inventory. Likewise, the local fire departments that serve our campuses require a chemical inventory from our facilities. Inventories are an essential planning tool for emergency and non-emergency events.

- **29 CFR 1910.1200(e)(1)(i) – (part of OSHA Hazard Communication Standard)**  
*A list of the hazardous chemicals known to be present using an identity that is referenced on the appropriate material safety data sheet (the list may be compiled for the workplace as a whole or for individual work areas); and,*
- **40 CFR 370.25 – (for Protection of the Environment)**  
*(a) Basic requirement. The owner or operator of a facility subject to this subpart shall submit an inventory form to the commission, the committee, and the fire department with jurisdiction over the facility.*
- **Section 307 – (International Building Code)**  
*High-hazard Group H occupancy includes, among others, the use of a building or structure, or a portion thereof, that involves the manufacturing, processing, generation or storage of materials that constitute a physical or health hazard in quantities in excess of those allowed in control areas constructed and located as required in Section 414. Hazardous materials in any quantity shall conform to the requirements of this code.*

## RESPONSIBILITIES

The inventory must include a full chemical name or identity that is referenced on the appropriate Safety Data Sheet (SDS), CAS number, approximate amount of the chemical with suitable units of measurement, physical state, responsible party, building, and room number. Additionally, EHS strongly recommends that the expiration date be added if one has been assigned to the chemical by the manufacturer.

Every individual who uses or stores chemicals on university property must adhere to the “Chemical Inventory Guidelines” (<http://ehs.wustl.edu>).

All data regarding chemical inventories in storage areas must be reviewed on an annual basis at minimum to ensure accuracy and compliance with regulatory requirements. If an investigator is funded through the Veterans Administration (VA) then they are required to conduct a full inventory of all chemicals every 6 months. For labs ordering and utilizing chemicals from the Department of Homeland Security (DHS) – Appendix A list or CDC select agent toxins, more frequent inventory reconciliation may be required in order remain below established threshold limits.

## SANCTIONS

Effective July 1, 2011, areas that are not compliant with the chemical inventory policy will receive an automatic failure during the annual EH&S laboratory safety inspection. Cases of noncompliance may also yield regulatory fines/penalties from agencies such as OSHA, EPA, CDC, DEA, local fire department, etc. All penalties or fines are the responsibility of the University department in which the infraction occurred. Grant funding may not be used to pay regulatory fines or penalties.