

#### **4.01 HAZARDOUS CHEMICALS AND RADIOACTIVE MATERIALS PURCHASING PROGRAM**

The University of New Mexico, like any other large and complex institution, uses a wide variety of hazardous chemicals and radioactive materials, which play a critical role in its teaching and research activities. The quantity of these chemicals/materials on campus has increased significantly with the growth of research and teaching programs at UNM over the past decade. This growth has also increased the complexity of monitoring and disposing of hazardous chemical and radioactive wastes. Furthermore, federal, state and local regulations regarding the procurement, storage and use of chemicals and other hazardous materials have also increased significantly. We must all share in the responsibility of ensuring that our environment remains safe for our faculty, staff, students, contractors, visitors and the surrounding community.

##### **A. SCOPE**

The purpose of this program is to provide a formal protocol regarding the purchase, distribution and disposal of hazardous chemicals and radioactive materials on campus. This program contains requirements for practices designed to provide the Department of Safety and Risk Services with important information regarding these materials/chemicals as they are brought onto University property. This program is applicable to all faculty, staff, students, volunteers, and contractual services employees who are involved in the purchase of hazardous chemicals and radioactive materials as defined below.

##### **B. DEFINITIONS**

**Chemical** - Any element, chemical compound or mixture of element(s) and/or compound(s).

**Container** – Any bag, bottle, box, can, cylinder, drum, or other vessel that contains a chemical.

**Hazardous Chemical** - Any chemical or product for which OSHA regulations require that the chemical manufacturer or distributor must provide a Material Safety Data Sheet (MSDS) to all customers. Any solid, semi-solid, liquid, or gaseous chemical which may pose a recognized physical hazard or a health hazard to humans, during normal work functions or during a spill or emergency. These chemical types would include, but not necessarily be limited to: corrosives (acids, bases); paints; petroleum products; poisons; oxidizers, reactives; solvents; etc. Also included in this definition are products such as paints, solvents, adhesives, lubricants, welding rods, explosives, and cleaning products. Exempted are the personal use of articles, food, food additives, alcoholic beverages, cosmetics, drugs and pharmaceuticals, hazardous wastes, tobacco and tobacco products, and many consumer products.

**Health Hazard** - Any chemical that may cause various acute or chronic health effects in exposed employees, such that they may be classified as carcinogens, reproductive toxins, sensitizers, hepatotoxins, mutagens, teratogens, nephrotoxins, neurotoxins, etc.

**Physical Hazard** - Any hazardous chemical with physical characteristics that make it combustible, explosive, unstable, pyrophoric, flammable, water-reactive, a compressed or cryogenic gas, an organic peroxide or an oxidizer.

**Radioactive Material** - Any radioactive material, including those that are naturally occurring.

## C. GOALS

This program seeks to provide a mechanism for tracking hazardous chemicals at the earliest point in the life-cycle process: the time of procurement. Radioactive materials have been and will continue to be under the strict control of UNM's Radiation Control Committee. The program also attempts to make the tracking process as transparent to the users as possible. It is important that we know what hazardous chemicals and radioactive materials are coming onto campus and where they are going for many good reasons including:

1. Various State and Federal regulatory agencies require that all employers maintain an inventory of all substances/materials which may cause an exposure of any chemical to employees. Other Federal agencies require accurate and timely chemical inventories for other stated reasons, and all threaten financial and other penalties for failure to comply. Principal Investigators and other chemical owners are responsible for developing and maintaining an inventory of the chemicals located within their area of jurisdiction, and for being able to produce this inventory upon an inspector's demand.
2. The U.S. Department of Homeland Security has imposed new regulations requiring their notification within 60 days of the purchase of any of the many chemicals in Appendix A.
3. To ensure that personal health and safety issues are being addressed at the point of use, such as proper training for individuals that work with these substances, appropriate use of personal protective equipment, presence and ready availability of a Material Safety Data Sheet (MSDS), adequate ventilation, safe storage, and proper labeling.
4. To ensure that environmental health issues are being addressed at the point of use, such as proper treatment, storage, transportation, and disposal of the hazardous chemical or radioactive material when it becomes a waste and to access information that qualifies, quantifies, and locates the hazardous chemical waste or radioactive waste on campus for regulatory reporting purposes. Also, to ensure that proper training is being completed for individuals involved in the handling and/or disposal of hazardous chemical wastes and radioactive wastes.
5. To ensure that emergency response and public safety issues are being addressed such as required reporting to the Local Emergency Planning Committee, local fire department, and the State Emergency Response Commission on the storage quantities, locations, container types, health and safety hazards, and temperatures and pressures of certain hazardous chemicals. Also, to ensure that proper training is provided to individuals who offer hazardous materials for transportation and to ensure that manifesting, packaging, and other issues are being addressed when hazardous materials/chemicals are being transported on and off campus.
6. To determine if a surplus of a particular chemical exists on campus that could be provided at reduced cost or no cost by another department.
7. To determine if a substitute can be used that is less hazardous and more environmentally friendly.

## D. PROCUREMENT

All purchases of hazardous chemicals and radioactive materials as defined above. Therefore, the Department of Safety and Risk Services has prepared the new Interactive Chemical Inventory Database (ICID) system to track purchases of such chemicals and to assist P.I.'s in monitoring their inventory of chemicals. Some of the benefits of ICID include entry of new chemical purchases directly into a P.I.'s inventory database, an accurate and real time tool to monitor each laboratory's inventory of chemicals, minimize disruption to research work, and to help provide SRS with the specific information that regulatory agencies require in chemical inventories.

**Note:** Hazardous chemicals and radioactive materials may not be purchased by using the UNM Petty Cash System.

**Radioactive Materials** will only be purchased by following the procedures listed in UNM's Radiation Safety Manual. Radioactive materials can only be purchased by a Permit Holder who obtains a Radioactive Materials Authorization Code from SRS prior to purchase. At this point of contact, SRS obtains all required tracking information as necessary.

**Hazardous Chemicals** may be purchased using one of the following methods:

- a. **Chemical Research and Laboratory Services (CRLS)** - It is recommended that all orders placed for chemicals through this department, located in the Chemistry Department, be purchased using your Purchasing Card (P-Card).
- b. **Chemical Purchase Order (C.P.O.)** - A special Chemical P.O. can be made available and could be used specifically for all chemical purchases that were previously intended to be purchased on a Small Purchase Order. It is recommended that all orders for chemicals be performed with the P-Card.
- c. **Purchase Requisition (P.R.)** - **No open or blanket orders are allowed directly with vendors unless specifically approved by SRS. In the event you have an open or blanket P.O., we request that your buyer contact Purchasing to assist you in exploring other chemical purchasing options, such as the "P-Card".**
- d. **Purchasing Card** – First, the P.I. orders chemicals from suppliers using the P-card and specifies the location for delivery (this process remains the same). Second, in order to use this card appropriately to purchase chemicals, each Purchasing Card holder must go to the ICID link on [www.srs.unm.edu](http://www.srs.unm.edu) and click on "Chemical Hygiene". Refer to the ICID Cookbook for more information on registration, entering data and saving information. After re-entering all the data from the chemical order into the "Requisition" function in ICID, save this data and click "print" for a hard copy (save this printout, you will need it to process your P-Card invoice)

**P-CARD SUBMISSION LABELS** - The UNM Purchasing Department has developed a labeling system that will help identify chemical purchases on P-Cards. At the end of the month, the P-Card holder or the individual purchasing chemicals in the PI's name must fill out and sign the P-Card Submission Label which can be found on the ICID Portal.

The P-Card Submission Labels are to be printed on sticker labels. The template used is an Avery 2x6 label format and the labels can be purchased at any office supply store. The P-Card Holder must fill out all fields on the label.

The ICID Requisition number can be found on the PDF Requisition report that is printed out after submitting a new requisition on the ICID system on the SRS website. The P-Card holder must indicate if the Material Safety Data Sheets (MSDS) are on file for the chemicals purchased by checking either the Yes or No boxes on the label. Lastly, the P-Card Holder must sign the label and stick the label onto the invoice the requisition was created for. If an order arrives in split shipments, only one P-Card Label is required on the first page of the invoice. It is important that the information on the P-Card label be legible. If there is no space available on the invoice to stick the P-Card Label and still be legible, you may either stick the label to the back of the invoice or stick the label to the requisition hard copy that was printed out after submitting the requisition. Please use the sticker labels only. Staple together: the stamped invoice; ICID printout and monthly P-Card Statement, and return these documents to the Purchasing Department for processing, this process will be audited through General Accounting and Purchasing to ensure compliance.