

## Annual Chemical Inventory Policy

### General

The Emergency Planning and Community Right-To-Know Act of 1986 (Title III of the Super Fund Reauthorization Act) requires facilities that make, store, or use certain chemicals to file reports with the state commission and local committees, if hazardous chemicals are present in regulated quantities.

This inventory is required to be reported annually to specific local, state, and federal agencies. In order to ensure that these reports are submitted, the law allows for penalties of \$27,500 per occurrence, plus \$27,500 per day, for each day the violation continues.

The process of conducting the annual inventory provides an excellent opportunity for each laboratory to review their research processes and dispose of unneeded chemicals. This is also an excellent time to ensure that the required Material Safety Data Sheets (MSDS's) for the laboratory are present and that the Laboratory Safety Plan is updated and current.

### Regulatory Guidance

- Environmental Protection Agency (EPA) 40 CFR Parts 300 and 355, Emergency Planning and Notification Requirements, Environmental Protection Agency (EPA)
- EPA 40 CFR Part 370, Chemical Inventory and MSDS Requirements
- EPA 40 CFR Part 372, Toxic Chemical Release Reporting Requirements
- Maine Revised Statutes Annotated (MRSA) Title 37-B, Ch. 13 MRSA 22,
- Maine's Chemical Substance Identification Law
- University of Maine Environmental Health and Safety Policy
- University of Maine System Laboratory Safety Plan

### Requirements

The chemical inventory process is initiated by Safety and Environmental Management (SEM) November of each year. At that time, SEM provides a comprehensive checklist and information packet to each department and serves as an information resource to all departments and remote sites. All workspaces and storage areas throughout the University must submit an annual Chemical Inventory to SEM by January 15 of each year for the previous calendar year. These areas are defined as:

- Offices
- Laboratories
- Classrooms
- Storage areas (office or laboratory)
- Janitor's closets
- Dark rooms

- Maintenance areas
- Remote sites

The only exempted areas are students' rooms in residential halls, the President's house, and any other residences on campus.

Records of annual chemical inventories are maintained by SEM for a minimum of 25 years.

## Responsibilities

**Safety and Environmental Management** is responsible for providing each laboratory with the proper forms, chemical lists, and instructions necessary to complete the annual chemical inventory; providing assistance in properly completing the annual inventory forms; tabulating and compiling the data received; and submitting annual summary reports to appropriate local, state, and federal authorities and agencies.

**The Department having jurisdiction over the particular laboratory** is responsible for providing SEM with a complete list of laboratories and a list of the principal investigators or laboratory managers responsible for those laboratories under its jurisdiction; and for ensuring that each area has a current chemical inventory completed by January 15 of each year.

**The Principal Investigator, Laboratory Manager, or Laboratory Supervisor** is responsible for submitting an annual chemical inventory by January 15; submitting the form for emergency contact numbers and posting them on the laboratory or office door; reviewing their MSDS files; reviewing their chemical usage for possible disposal of unneeded chemicals; and reviewing and updating as necessary their laboratory's Chemical Hygiene Plan.

## Definitions

**Chemicals:** Any element, chemical compound, or mixture of elements and compounds.

**Hazardous Chemical:** A chemical that is a physical or health hazard, as listed by the Bureau of Labor Standards, the United States Department of Transportation, or the United States Environmental Protection Agency.

**Laboratory:** A work area devoted to experimental study in any science or to testing or analysis by scientific means under the supervision of a person trained in the handling of hazardous chemicals.

**Material Safety Data Sheets (MSDS's):** Forms that contain information concerning a hazardous chemical and which include both acute and chronic health hazard information.

**Office:** A work area where standard office, computer, or reproduction machines are used a majority of the time.

**Shop:** A work area devoted to the fabrication, restitution, or modification of an object and consisting primarily of physical and electrical hazards.

### **For Additional Information**

Contact your Department Safety Coordinator or the Department of Safety and Environmental Management at 207/581-4055.

### **Document History**

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