

SUBJECT: Chemical Inventory SOP

1. **PURPOSE:** The Occupational Safety and Health Administration’s (OSHA) hazardous communications standard requires that employers inform their employees of all chemical hazards they may be exposed to in the workplace. This is accomplished through the maintenance of chemical inventories and safety data sheets (SDS) for each of the listed chemicals. The actions described below document how the research service addresses this OSHA standard.

2. **DEFINITIONS:**

ACOS/R	Associate Chief of Staff for Research
ADPAC	Automated Data Processing Application Coordinator
AO/R	Administrative Officer for Research
DOT	Department of Transportation
EPA	Environmental Protection Agency
HEFP	Healthcare Environment and Facilities Programs
PI	Principal Investigator
PPE	Personal Protective Equipment
SDS	Safety Data Sheet
SRS	Subcommittee on Research Safety

3. **ACTION:**

- a) Responsibilities of the Principal Investigator (PI)
 - i) Chemical Inventories shall be updated in “real time”; i.e., a new chemical is entered into the inventory when received. Inventories shall include all chemicals stored within your program space or used by your program personnel. Exceptions are office supplies common to the facility and pharmaceuticals in solid, final form for direct administration to patients, i.e., tablets or pills.
 - ii) When a chemical is depleted or discarded, it shall be “archived” in the inventory (See [HEFP SDS Instructions](#) located on the R-Drive R:\All_Staff\Training\Training Material\Checklist and Materials for details). However, a chemical should only be archived if it will not be used again. If it is depleted, but may be used again, simply indicate that none is on hand.
 - iii) All staff shall have access to the Safety Data Sheet (SDS) for each chemical in their area.
- 1) All research programs with access to the VA computer system shall use the VHA Healthcare Environment and Facilities Program (HEFP) SDS Program for maintaining their chemical inventory and SDS’s.
 - a. New employees gain access to the VA computer system through the Research Service ADPAC (ext. 31-1566 or 31-7660).
 - b. The chemical inventory is to include all chemicals, including cleaning agents and pharmaceuticals, located in your research program areas. Office products are managed separately, i.e., in a common facility folder entitled “Office Products.”
 - c. The HEFP Electronic SDS Program can be accessed in 3 ways:
 - i. VA Intranet Home > MVAHCS SharePoint > Reporting, Safety Concerns & Emergency Info > Safety Data Sheets (SDS)

- ii. Go to your VA computer desktop and open “MIN-GUI” Executables/“MIN Shortcuts” folder/Right click on “MSDS & SDS”/“Send to” and click “Desktop (create shortcut)”
 - iii. Go to <http://vawww.hefp.va.gov/occupational-safety-health-gems/safety-data-sheetchemical-inventory-service> and click the star icon at the right of your navigation bar to bookmark the site.
 - d. Training in maintenance of the chemical inventory is required for at least one member, i.e., “administrator”, of each research group.
 - i. Basic Administrators Training available on TMS (course #24655) provides valuable information for all VA employees, but will not grant administrator access.
 - ii. To become an administrator, the employee must complete the TMS Advanced Administrators Course (#29466). This course satisfies the prerequisites to obtain an SDS Administrators log in and password necessary to manage one’s chemical inventory in this service.
 - iii. Monthly Live Training is available the first Tuesday of each month at 10:30 CST for administrators. The purpose of this training is to provide program updates, address problematic areas and capabilities available to administrators, followed by a brief Q&A session open to questions attendees may have.
 - iv. Once training is complete the Research Safety Coordinator (ext. 31-5180) will submit your name to HEFP for administrative access.
 - 2) For research programs off-campus, their chemical inventory and SDSs shall be maintained in their laboratory and a current copy of the chemical inventory is to be submitted electronically to the Research Safety Coordinator annually.
- b) Responsibilities of the Subcommittee on Research Safety (SRS):
- i) When a new PI is given a laboratory, the PI will be informed of the follow responsibilities:
 - 1) Creating and maintaining a chemical inventory is mandatory.
 - 2) Directions for entering chemicals and training are available through the Monthly Live Training for administrators (see above).
 - ii) A representative of the SRS will verify that the chemical inventory is up to date via random sampling of the chemicals located in each laboratory that will be compared against their current chemical inventory.

Note: Hazardous chemicals listed in approved protocols may be absent from a program’s chemical inventory if the chemical has not been previously used and has not been received.
 - iii) If there is noncompliance in maintaining a current chemical inventory, the PI will be notified by the Chair of the SRS or a delegated alternate that their inventory is not current. The lab is to correct this issue within two weeks of being informed of the deficiency.
- c) Administrative oversight of chemical inventories:
- i) Representatives from facility Safety perform semi-annual comprehensive inventories of hazardous chemicals/agents as defined by OSHA, Department of Transportation (DOT) and Environmental Protection Agency (EPA).
 - ii) The first review will be conducted sometime during the first two quarters of the fiscal year, while the second will be conducted during the last two quarters of the fiscal year.
 - iii) Summarized reports of their reviews will be submitted to the SRS.

4. REFERENCES:

- 1) VHA Handbook 1200.08, Safety of Personnel and Security of Laboratories Involved in VA Research. April 24, 2019 (Amended January 8, 2021).
https://www.va.gov/vhapublications/publications.cfm?pub=1&order=asc&orderby=pub_Number
- 2) OSHA Occupational Safety and Health Standards, 29 CFR Part 1910.
http://www.osha.gov/pls/oshaweb/owastand.display_standard_group?p_toc_level=1&p_part_number=1910
- 3) Healthcare Environment and Facilities Programs (HEFP), Enterprise Support Services (ESS), Safety Data Sheet / Chemical Inventory Service. <http://vaww.hefp.va.gov/occupational-safety-health-gems/safety-data-sheetchemical-inventory-service>

5. **SRS APPROVED:** August 29, 2023

6. **RESCISSION:** "SRS-002 – Chemical Inventory" Approved August 29, 2017

7. **EXPIRATION DATE:** N/A

8. **FOLLOW-UP RESPONSIBILITY:** Subcommittee on Research Safety (SRS)