

Procedure for Procurement of Hazardous Materials

I. Background

The purchase of hazardous materials at California State University, Fullerton must have specific oversight by departments assigned with the responsibility to inventory, use, and purchase the materials. CSUF departments identify the hazardous material for purchase, Environmental Health and Safety reviews hazardous materials purchase requests, and the Contracts and Procurement office or authorized auxiliary purchasing department oversees the purchase of the material. The safe and compliant purchase of hazardous materials must include the ability to review the purchase of certain categories of hazardous materials known for a higher risk due to flammability, corrosivity, reactivity, and toxicity.

II. Scope

Applies to State, Associated Students, Inc., Housing, Auxiliary Services Corporation, and Philanthropic Foundation's procurement of hazardous materials and receipt of gifts-in-kind.

III. Definitions

Hazardous Material – Any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. (Health and Safety Code Section 25501 (o))

CiBR-Trac – CSUF EHS database for chemical inventories and is used to facilitate EHS review of hazardous material purchases.

Department Hazardous Material Purchase Staff – Assigned personnel that have the responsibility for purchasing hazardous materials for their specific department/area. These personnel have access to CiBR-Trac's hazardous material purchase form.

IV. Responsibilities

1. Environmental Health and Safety (EHS)
 - a. Maintain chemical, biological, and radioactive inventories for Principal Investigators and Responsible Parties and oversee delivery of Drug Enforcement Administration (DEA) regulated chemicals and radioactive substances.

- b. Reviews hazardous materials purchase forms within three business days of receipt.
 - c. Coordinate with Procurement staff auditing of the Hazardous Materials Purchase Program on an annual basis to monitor compliance and enforce hazardous materials purchasing requirements.
 - d. Train Department Hazardous Material Purchase Staff on accessing the form on EHS's CiBR-Trac software database.
 2. Department Hazardous Material Purchase Staff
 - a. Purchase hazardous materials requested by employees in their department using approved payment methods established by Contracts and Procurement according to approved guidelines and procedures.
 - b. Complete the hazardous materials purchase form when required.
 - c. Coordinate with EHS and Procurement on annual audits of the hazardous materials procurement procedures.
 3. Contracts and Procurement or Authorized Auxiliary Purchasing Department
 - a. Process hazardous materials purchase requests that have been reviewed and approved by EHS.
 - b. Provide oversight of all procurement card (P-Card) and hazardous materials purchase requisitions/purchase orders.
 - c. Coordinate with EHS on an annual audit of the hazardous materials procurement procedures.
 4. Shipping and Receiving
 - a. Receives hazardous materials purchased using approved payment methods established by Contracts and Procurement.
 - b. Submits the hazardous materials to EHS for barcoding.
 - c. Delivers the hazardous materials to campus departments.
 - d. Does not deliver Drug Enforcement Administration (DEA) regulated chemicals or radioactive substances to campus customers.

V. Hazardous Materials that Require EHS Preapproval

Chemical purchase requests (including donations) will be evaluated to ensure applicable storage, use, and disposal methods have been addressed. The following hazardous materials require EHS preapproval and must be requested through a hazardous materials purchase form prior to purchase using approved payment methods established by Contracts and Procurement, which include the P-Card or requisitions/purchase orders.

A P-Card may be used to purchase hazardous materials listed in Appendix B: Routine Cleaning and Maintenance Chemical Preapproval only by the respective areas, and Appendix C: Exempt Chemicals Substances. However, a requisition will be required for hazardous materials listed in Appendix B and C that are more than 30 gallons and/or delivered to a location that is not the central shipping and receiving area for campus or other designated shipping and receiving area for the auxiliaries and housing. EHS' approval and a requisition are required for hazardous materials found in Appendix D through M.

1. DEA Regulated Chemicals – Controlled Substances
 - a. Drug or other substance, or immediate precursor, regulated under the Federal Controlled Substances Act and the California Uniform Controlled Substances Act to prevent illicit abuse. Drugs are categorized according to a substance's medical use, potential for abuse, and safety or dependence liability by designated schedules, I-V.
2. DEA Regulated Chemicals – Precursor Chemicals
 - a. Chemicals and solvents regulated by the DEA, State of California Department of Justice and the Office of the Attorney General (CA-DOJ) to prevent the illicit manufacture of controlled substances.
 - b. These listed chemicals and solvents are categorized on two DEA regulated lists, List I and List II, and the California DOJ precursor chemicals list. List I typically represents precursor reagents while List II represents solvents that can be used in the synthesis and purification of controlled substances.
3. Radioactive Materials – Any and all substances and materials, the handling of which requires approval, consent, permit, or license from the Nuclear Regulatory Commission, including any and all substances and materials the handling of which requires a radioactive material license or other similar approval, consent, permit or license from the State of California.
4. All human and primate tissues or culture cell lines and animal/insect tissue or culture cell lines that have been exposed to infectious agents.
5. Pyrophoric Substances- Substances capable of spontaneously igniting in air.
6. Water Reactive Substances- Substances that are dangerous when wet because they undergo a chemical reaction with water.
7. List of Highly Hazardous Chemicals, Toxics and Reactives.
8. Department of Homeland Security (DHS) Appendix A Chemicals of Interest (COI).
9. U.S. Department of Transportation (DOT) Class 1.1A Explosives.
10. Peroxide Forming Chemicals Class A.
11. Compressed Gases and Highly Toxic Gases.
12. Any chemical purchased in quantities in excess of 30 gallons in a single order.

VI. Hazardous Materials EHS Purchase Approval Process

1. Department Hazardous Material Purchase Staff log in to CiBR-Trac, access the Hazardous Materials Purchase form, complete and submit form.
2. EHS receives the form, reviews purchase, addresses any questions with the requesting department, approves or denies the form within three business days.
3. If approved, the department's hazardous material purchase staff will receive an email with an approval number, which is to be attached to the requisition request for processing.

VII. Hazardous Materials Purchase for Routine Cleaning and Maintenance

1. Due to the turnover of these hazardous materials, these items are not inventoried.
2. P-Cards can be used to purchase consumer available chemicals less than 30 gallons (e.g., paints, landscaping products, custodial cleaning products, automotive fluids, emergency response supplies), and does not require submittal of a hazardous material purchase form for EHS review or pre-approval. See Appendix B.
3. New routine cleaning and maintenance hazardous materials that are not on the EHS pre-approved list (Appendix B) or exempt chemical substances list (Appendix C) must be reviewed for approval prior to purchase; if approved, the new material will be added to the pre-approved list or exempt chemical substances list maintained by EHS.
4. Departmental pre-approved products may be purchased by that department's hazardous materials purchasing staff without seeking EHS preapproval for each purchase.

VIII. Appendices

- Appendix A, Chemical Purchasing Flowchart
- Appendix B, Routine Cleaning and Maintenance Hazardous Materials Preapproved List
- Appendix C, List of Exempt Chemical Substances
- Appendix D, List of Highly Hazardous Chemicals, Toxics and Reactives
- Appendix E, Department of Homeland Security (DHS) Chemicals of Interest (COI)
- Appendix F, Drug Enforcement Administration (DEA) Controlled Substances
- Appendix G, Drug Enforcement Administration (DEA) List I and List II Regulated Chemicals
- Appendix H, U.S. Department of Transportation (DOT) Class 1.1A Explosives
- Appendix I, Peroxide Forming Chemicals, Class A

- Appendix J, Pyrophoric Substances
- Appendix K, Water Reactive Substances
- Appendix L, Compressed Gases and Highly Toxic Gases
- Appendix M, Radioactive Materials

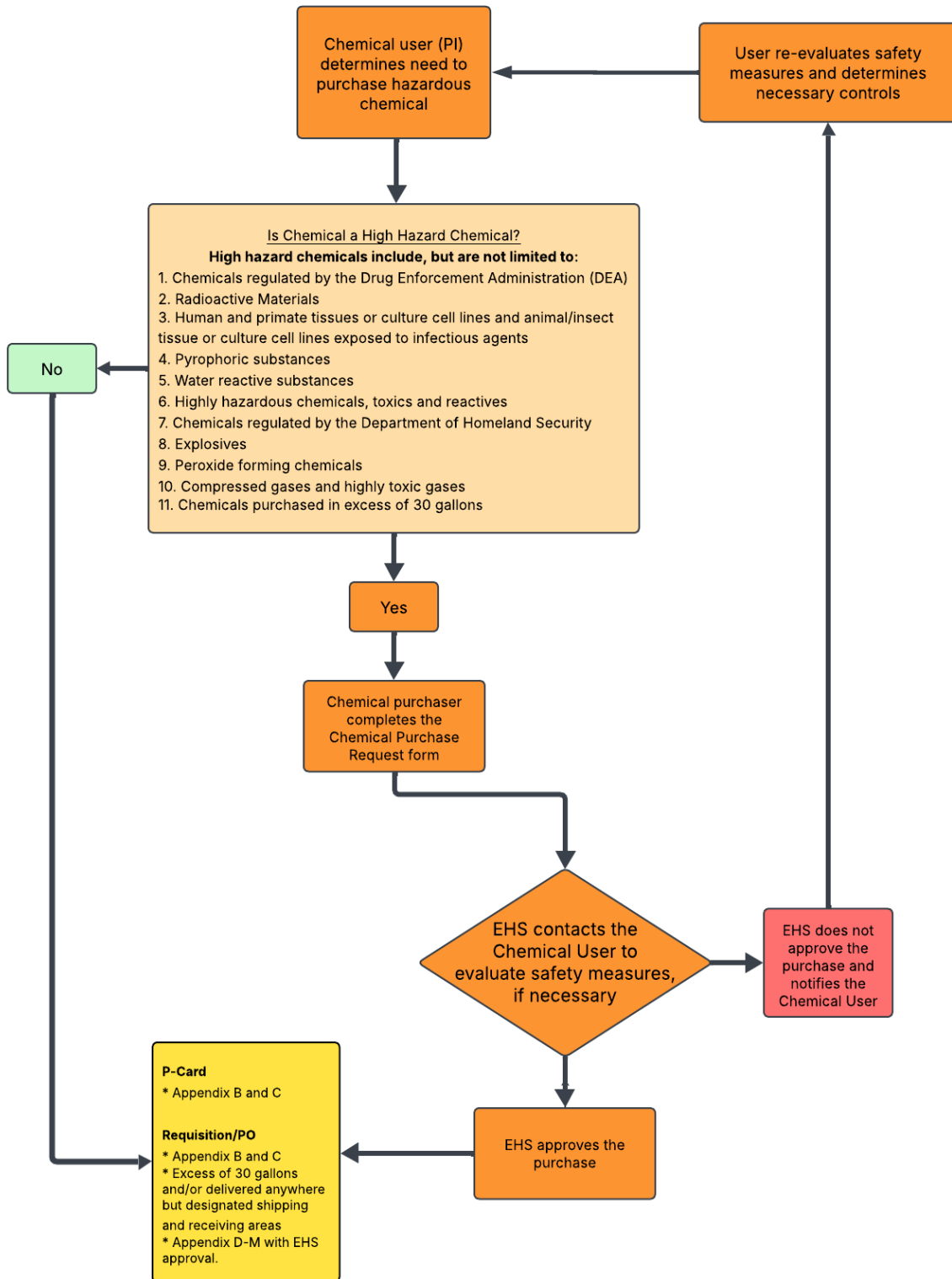
Responsible Executive: Vice President for Administration and Finance

Responsible Office: Environmental Health and Safety

Originally Issued: 12/2019

Revised: 05/2025

Appendix A: Chemical Purchasing Flowchart



Appendices

Appendix B: Routine Cleaning and Maintenance Chemicals Preapproved List

[Appendix B Routine Cleaning and Maintenance Chemicals Preapproved List.xlsx](#)

Appendix C: Exempt Chemical Substances (No Approval Required)

[Appendix C Exempt Chemical Substances \(No Approval Required\).xlsx](#)

Appendix D: List of Highly Hazardous Chemicals, Toxics, and Reactives

[Appendix D List of Highly Hazardous Chemicals, Toxics, and Reactives.xlsx](#)

Appendix E: Department of Homeland Security (DHS) Chemicals of Interest

[Appendix E Department of Homeland Security \(DHS\) Chemicals of Interest.xlsx](#)

Appendix F: Drug Enforcement Administration (DEA) Controlled Substances

[Appendix F Drug Enforcement Administration \(DEA\) Controlled Substances.xlsx](#)

Appendix G: Drug Enforcement Administration (DEA) List I and List II Regulated Chemicals

[Appendix G Drug Enforcement Administration \(DEA\) List I and List II Regulated Chemicals.xlsx](#)

Appendix H: Department of Transportation (DOT) Class 1.1A Explosives

[Appendix H Department of Transportation \(DOT\) Class 1.1A Explosives.xlsx](#)

Appendix I: Peroxide Forming Chemicals Class A

[Appendix I Peroxide Forming Chemicals Class A.xlsx](#)

Appendix J: Pyrophoric Substances

[Appendix J Pyrophoric Substances.xlsx](#)

Appendix K: Water Reactive Substances

[Appendix K Water Reactive Substances.xlsx](#)

Appendix L: Compressed Gases and Highly Toxic Gases

[Appendix L Compressed Gases and Highly Toxic Gases.xlsx](#)

Appendix M: Radioactive Materials

[Appendix M Radioactive Materials.xlsx](#)