

STANDARD RECOMMENDATIONS FOR CORRECTING COMMON DISCREPANCIES

AP - APPROVED TREATMENT PROTOCOLS NOT BEING FOLLOWED AND/OR RECORDED: Only those Treatment Protocols listed in this CMPlan are approved for use by UMKC personnel. The use of each treatment protocol procedure must be documented and kept on file by the Hazardous Materials Supervisor of the laboratory in which the procedure was conducted.

RECOMMENDATION: Follow approved treatment protocols for hazardous and nonhazardous chemicals listed in Appendix C of the CMPlan. The pertinent information describing the treatment protocol procedure used and the results must be recorded and retained on file. New treatment protocols can be submitted to the Director of CBARS for approval.

AU - INADEQUATE LIST OF AUTHORIZED USERS: Any person(s) authorized to use and accept hazardous chemicals in your laboratory from a Central Storage or Distribution Area must be on a posted Authorized User List.

RECOMMENDATION: Compile and post an accurate list of authorized users for your laboratory. Give one copy of the list to your Hazardous Materials Manager for his/her records.

DC - DAMAGED CONTAINERS: Damaged containers include containers with missing or cracked caps, damaged seals, rusted containers, missing or obliterated labels, or inappropriate caps, e.g., aluminum foil, parafilm, saran or wax papers

RECOMMENDATION: If the chemical is still usable, transfer the contents to an appropriate container, apply a proper label, and issue a new Life Tag if necessary. If the chemical is not usable, transfer contents to an appropriate container and 1) return it to Central Storage or 2) designate as waste for disposal by CBARS.

DT - DUPLICATE LIFE TAG: Life Tags must have a unique identification number for each hazardous chemical.

RECOMMENDATION: Obtain a new unique identification numbered Life Tag for each hazardous chemical from the Hazardous Materials Manager or Supervisor.

EC - EMPTY CONTAINER: Empty containers of hazardous chemicals may be managed in one of three ways depending upon the characteristic hazard associated with its contents.

RECOMMENDATION: Containers used for chemicals listed in the RCRA P Listed must be disposed by CBARS. Empty containers of other hazardous chemicals may be triple rinsed; the rinseate put in an appropriate container and reused or disposed of as refuse. Empty containers of non-hazardous chemicals may be triple rinsed, the rinseate disposed into the sanitary sewerage system and reused or disposed of as refuse. Remove the Life Tags and obliterate original labels on empty containers prior to disposal.

EL - EXPIRED LIFE TAG: Life Tags are to be issued for one year or for the shelf life, whichever is less.

RECOMMENDATION: If the hazardous chemical is in continued use and the shelf life has not expired, a new Life Tag may be issued by the Hazardous Materials Manager or Supervisor upon request.

ES - EXPIRED SHELF LIFE: Hazardous chemicals with expired shelf lives or within one month of expiring may be designated as **used** for recycling or disposal by CBARS according to the CMPlan.

RECOMMENDATION: If designated used, put hazardous chemical on a Hazardous Chemical Pick Up Form. If in the professional judgment of the Hazardous Materials Manager or Supervisor the chemical is still usable, he/she may extend the inventory life for one year and re-inventory the hazardous chemical according to the CMPlan.

FR - FOOD IN REFRIGERATOR: A refrigerator that is used to store chemicals may not be used to store food and/or drink.

RECOMMENDATION: Remove all food and/or drink from the refrigerator.

II - INADEQUATE INVENTORY SUMMARY: An inventory of hazardous chemicals must be updated semi-annually. A current inventory must be provided to CBARS, when requested, to conduct annual audit inspections.

RECOMMENDATION: Update your inventory of hazardous chemicals at least quarterly.

IS - INCOMPATIBLE STORAGE: All chemicals must be stored according to RGN compatibility.

RECOMMENDATION: Consult the Hazardous Waste Compatibility and Incompatibility Lists to assist you in making determination concerning compatible storage of chemicals. If you have any questions, call CBARS.

IT - INCORRECT INFORMATION ON LIFE TAG: Information on the Life Tags must be complete and include the unique identification number, the name of the hazardous chemical (if available, both the common and chemical name), the quantity, the start use date, the end use date and the location or name of the Hazardous Materials Supervisor.

RECOMMENDATION: Contact your Hazardous Materials Manager in order for the necessary changes to be made on the Life Tag and the Hazardous Materials Inventory Summary Form.

LT - NO LIFE TAG: Any hazardous chemical that is used or stored outside a Central Storage Area must be inventoried and labeled with a Life Tag. The only exceptions are those hazardous chemicals in use containers, e.g., test tubes or flasks.

RECOMMENDATION: Determine if the chemical is on the RCRA P or U Lists or could generate a characteristic waste. Attach Life Tag to the container. If the chemical is not specifically excluded on the Exempted Products Categories List contact CBARS for a resolve.

MS - MATERIAL SAFETY DATA SHEET NOT MAINTAINED: UMKC endeavors to safeguard the health and welfare of the faculty, staff, students and the community by implementing guidelines comparable to the Hazard Communication Standard. All Hazardous Materials Supervisors are required to keep MSDS information on file for all hazardous chemicals used in their laboratory. This information should be made available to all UMKC employees that may be exposed to these hazardous chemicals.

RECOMMENDATION: Contact the chemical manufacturer or supplier and request a copy of the Hazardous Chemical MSDS be sent to the Hazardous Materials Manager of your department.

NL - NO LABEL: Every container, including use containers, must have a label securely attached to it that clearly identifies the contents of the container.

RECOMMENDATION: Attach a label that clearly identifies the contents of the container.

NT - FACILITY HAZARDOUS MATERIALS SUPERVISOR WITH NO TRAINING: Hazardous Materials Supervisors must receive two hours of training conducted by CBARS. Newly appoint Hazardous Materials Supervisors must be received their training within 30 days of the use of hazardous chemicals.

RECOMMENDATION: Contact CBARS to register for the next available training session.

SA - UNAUTHORIZED SATELLITE ACCUMULATION CONTAINER: A satellite accumulation container distributed by CBARS must be maintained in a designated location.

RECOMMENDATION: Return the satellite accumulation container to the designated location. If the location of the container is not convenient or additional containers are required, contact CBARS, 235-1642.

SC - MATERIALS STILL IN SHIPPING CONTAINERS: Chemicals should only be stored in shipping containers (secondary containers) if the particular characteristics of the substance require as protective over pack in order to maintain the integrity of the chemical and/or for safety purposes. The secondary container must be maintained in good condition, this includes being free of corrosion or any other defect that may imperil the condition of the primary container.

RECOMMENDATION: If the chemical does not need to remain in the shipping container, remove it and attach a Life Tag to the primary container. If the shipping container has been damaged, carefully remove the chemical from it and inspect the condition of the primary container. If it is okay and needs to be stored in a secondary container, transfer the item to any appropriate secondary container and affix the Life Tag to the secondary container. Discard any damaged shipping containers properly.

UM - UNAUTHORIZED MATERIALS IN ROOM: All hazardous chemicals that are used and/or stored in the laboratory must be obtained through your Hazardous Materials Manager. If you receive or transfer hazardous chemicals from one laboratory to another you must follow established procedures and go through your Hazardous Materials Manager.

RECOMMENDATION: Notify your Hazardous Materials Manager of any receipt or transfer of hazardous chemicals so that Life Tags and Hazardous Materials Inventory Summary Forms may be completed.

UW - UNDECLARED USED CHEMICALS: Every container must have only one label. The label needs to be securely attached and clearly identify the contents of the container. The container must also have the accumulation start date (the date you first added hazardous chemical to the container). CBARS recommends that within 90 days after the accumulation start date the container should be retrieved by CBARS.

RECOMMENDATION: Label all containers with the word "USED", the accumulation start date, the contents of the container.