

## Inventory FAQs

**Q. Is the inventory applicable to all hazardous chemicals no matter the quantity?**

A. Yes the inventory is applicable to all hazardous chemicals and it must indicate the number of containers and the amount that was in each original container when purchased or obtained.

**Q. How often should the inventory be updated?**

A. Although it may not be practical to maintain an up to date inventory it should be updated annually.

**Q. Is an audit/verification of the inventory needed? If so how often and by whom?**

A. An annual update by the EHS Rep, the PI or their designee would be the verification. The EHS Office does initiate an annual survey of and report on the presence of chemicals on the Superfund Amendment and Reauthorization Act (SARA) list and a biennial lab survey of and report on the presence of chemicals on the Department of Homeland Security (DHS) Chemicals of Interest (COI) list. EHS will also initiate a quarterly survey for 40 chemicals on the DHS list with low reporting quantities.

**Q. What happens if we discover a chemical hidden somewhere that's not on our current inventory?**

A. There are no negative repercussions if you find a chemical was overlooked in an initial inventory but once discovered the chemical should be added to the inventory.

**Q. How are hazardous chemicals defined?**

A. Hazardous chemicals include chemicals for which there is statistically significant evidence of health effects following exposure and flammable and explosive substances.

**Q. How are unusually hazardous chemicals defined?**

A. Unusually toxic or hazardous materials include substances with a high degree of acute and/or chronic toxicity. They may include explosives, certain highly reactive and/or corrosive substances. Unusually toxic chemicals are those that meet the OSHA definition of high acute toxicity (oral LD50 <50mg/kg, skin contact Ld50 < 200 mg/kg, or inhalation LC50 <200 ppm in air).

**Q. We currently document the presence of chemicals in our lab that are on the DHS list and SARA chemicals. Are there other lists of chemicals that require special consideration and/or management? If so what are the criteria for these chemicals?**

A. The EHS Office has reviewed commonly purchased chemicals at MIT and determined whether or not they are Particularly Hazardous Substances (PHS) as defined by OSHA. A list of these chemicals can be found at <http://web.mit.edu/environment/ehs/phs.html>. The labs are not required to have any special documentation of their use but they should be listed on the inventory.

**Q. Should the inventory be submitted to EHS?**

A. No although EHS does have administrative control of ChemTracker.

**Q. Time will be an issue in implementing the inventory. What resources if any will be available?**

A. EHS offers ChemTracker training to people authorized by their DLC to maintain the inventory. If an inventory is in a properly formatted excel spreadsheet ChemTracker will upload it into the inventory system. Please contact EHS for the proper formatting at [environment@mit.edu](mailto:environment@mit.edu).