Procurement of Hazardous Materials at UH

OTU INYANG SAFETY MANGER
RADIATION & LASER SAFETY OFFICER
ENVIRONMENTAL HEALTH & LIFE SAFETY
WWW.UH.EDU/EHLS
Outline

- Background
- Commonly Purchased Hazardous Material
- What’s the Big Deal?
- Addendum B
- P-Card: convenience or distraction?
- Recent Events
- Discussions on Policy Awareness
- Q&A
Background

• Certain hazardous materials are used for research and university operations in certain departments:

Examples

• Natural Science and Mathematics
• Colleges of Pharmacy, Optometry, Technology, Engineering
• Student Activities- laser light shows
• Athletics: x-ray imaging facility at TDCEU stadium
Commonly Purchased Hazardous Materials

- Radioactive Material
- X-ray machines
- Regulated Lasers (Class 3b & 4)
- Biological Agents that are either Select Agents/Toxins or Risk Groups 2 or 3
- Other Hazardous Chemicals
- Other Items of Concern: Biological Safety Cabinets
SO WHAT’S THE BIG DEAL?
Recordkeeping, Safety & Compliance

- Texas Department of State Health Services Radiation Control Regulations-licensed & registered activities
- Federal Rules- CDC, NIH, FDA, NRC, EPA, etc.
- Material Accountability
- Annual Inventory Control
- Machine and Device Registry
- Accountability for Safe Use required of UH
- Emergency Reporting Requirements (Chemicals)
- Faculty, staff, students and public safety
MAPP 04.01.01-C. When to Use a Purchase Order

(2) The following purchases must be placed on a purchase order regardless of the dollar amount:

a. Radioactive materials, x-ray machines, Class 3b and 4 lasers, biological safety cabinets, and other hazardous materials. – Requisition created by department and routed to Purchasing to create a PO (No P-CARD?).

Note: The Pre-Approval Form for Requisitions (Addendum B for Requisitions) at http://www.uh.edu/purchasing must be used to obtain pre-approval for the above purchases.
Addendum B – What’s that?

- Pre-Approval Form for Requisitions with Hazardous Items ...
- Radioactive Materials
- X-Ray Machines
- Class 3b and 4 lasers
- Biological Agents that are either Select Agents/Toxins or Risk Groups 2 or 3
- Biological Safety Cabinets
- UH Controlled Chemicals- listed by name and quantity
How in the world am I supposed to know all these?

CONTACT EHLS DEPARTMENT FOR ASSISTANCE AT
713-743-5858 OR EHS@UH.EDU
P-Card: Convenience or Distraction?

- **Policy 04.01.01 prohibits use of P-card for items on Addendum B, However...**

- Do your departments use P-Cards for chemical purchases or other items on Addendum B?

- Do laboratory personnel at your department by-pass the financial office during purchase of radioactive material or lasers?
Recent Events (Some)

- **Surprise...Radioactive Material Shipment**
  - State and federal regulations require license verification for both intended buyers (UH personnel) and suppliers (vendors)
  - My Financial Coordinator was out of the office so I just called the vendor...

- **Surprise... New Lasers in the laboratory**
  - State and federal regulations require laser registration, inventory, adequate use controls for every class 3b & 4 laser
  - We bought this from EBay a few months ago...

- **Refusal to comply or lack of policy awareness?**
Policy Awareness- Discussion

- How can we assist provide awareness to new College/ Division Business Administrators, Financial Coordinators?
- How can we assist provide awareness to new Faculty members, Post Docs, Research Assistants?
- How can we assist bring awareness to persons involved with new student activities that may impact these policies?
QUESTIONS

CHALLENGES?

QUESTIONS?

SUGGESTIONS?

COMMENTS?
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<td><a href="http://www.uh.edu/ehls">www.uh.edu/ehls</a></td>
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