

Spot Check:

OSC 2018 Hazardous Materials Audit Follow Up

2/22/19

The NYS Office of State Comptroller audited seven SUNY campuses between July 2017 and January 2018, and issued a findings report in December 2019, *Oversight of Hazardous Materials and Waste, State University of New York*.

The OSC audit had three main concerns: laboratory access, chemical procurement, and inventory and accounting for chemicals. Here is a summary of their concerns and potential campus actions.

Laboratory Access

A concern was raised that laboratories were not always locked, and that some campuses could not produce key distribution records which would indicate who had access to various laboratories.

- Campuses may wish to review key distribution and lab access policies on a periodic basis.
- Campuses may wish to review risk assessments and determinations of access control for various areas. Areas with particularly harmful or valuable materials may require a greater level of security than an introductory teaching laboratory space. Attention should be given to confirming that spaces with greater security concerns are appropriately secured. The National Research Council has published *Chemical Laboratory Safety & Security* which addresses some of the concerns (<https://system.suny.edu/media/suny/content-assets/documents/capital-facilities/environmental-health/Chemical-Laboratory-Safety-and-Security.pdf>)
- Campuses should review procedures so that key or card access is removed from individuals who no longer have the need for access.

Procurement

The concern in this area was related to controls over purchases of chemicals with the suggestion that they could be strengthened by requiring additional approvals to better document business need and reasonableness of the purchases, further restricting potential delivery locations, and confirming segregation of duties between the purchaser and recipient. They were particularly focused on p-card purchases.

- Campuses may wish to consider restriction of chemical purchases to limited authorized people, perhaps with merchant codes restrictions on p-cards.
- Campuses may wish to consider developing controls to flag and require pre-approval of certain types of chemical purchases.

Accounting/Inventory

The report makes reference to “accounting” or maintaining an inventory of chemicals. Compliance with provisions in the campus Chemical Hygiene Plans (which reflect local risk assessments and mitigation strategies) was examined.

- Campuses should consider their inventory requirements. Inventories of all chemicals are not strictly required by 1910.1450, but they arguably provide a path to better controls and may reduce waste. Inventories can help in ordering, storing, handling, and disposing of chemicals, as well as emergency planning.
- Campuses are advised that OSHA 1910.1450(e) requires annual review and evaluation of the effectiveness of the Chemical Hygiene Plan. This review should be documented. Campuses should review the requirements of their plan and confirm that the requirements reflect current risk assessments and that labs are complying with the requirements.