

FLORIDA	OFFICIAL
POLYTECHNIC	UNIVERSITY
UNIVERSITY	POLICY

Subject/Title: The Procurement, Use and Possession of Hazardous Materials & Radiation Producing Equipment
FPU Policy Number: FPU-9.0041P
<input type="checkbox"/> New Policy <input checked="" type="checkbox"/> Major Revision of Policy <input type="checkbox"/> Minor Technical Revision of Policy
Date First Adopted: December 16, 2014
Date Revised: August 24, 2015
Responsible Division/Department: Environmental Health & Safety (EHS)
Initiating Authority: Ghazi Darkazalli, Executive Vice President & Provost, Academic Affairs

A. APPLICABILITY/ACCOUNTABILITY:

This policy applies University-wide, included but not limited to all faculty members, visiting scholars, staff members, students, volunteers, and affiliates who procure, use, or possess hazardous materials or radiation-producing equipment.

B. POLICY STATEMENT:

The Department of Environmental Health and Safety (EHS) is the designated authority for compliance with applicable hazardous materials and radiation-producing equipment regulations, including those regulations that apply to research activities and any safety requirements specified in grants.

EHS provides safety training, safety audits and hands on support to University researchers to ensure the incorporation of health and safety practices in research and teaching activities so that the University meets grant safety requirements. In conjunction with the Vice President and Provost, the Director of EHS has the authority to notify a researcher of noncompliance with safety issues and request correction within thirty (30) days and if necessary, the authority to direct the researcher to suspend unsafe activity until corrected. EHS acts as an informational resource for researchers who have questions about best safety practices, who must procure safety equipment, correct potential hazards and respond to inquiries from external agencies. EHS, under the Vice President and Provost/designee also acts as a liaison with external regulatory agencies to ensure compliance with grant safety requirements.

C. DEFINITIONS:

Hazardous Materials. Any material that, because of its quantity, concentration, or physical, chemical, or biological, radiological characteristics, may pose a hazard to human health or the environment.

Restricted Hazardous Material. A hazardous material that requires a license, permit, or specialized reporting before procurement or use.

Radiation-producing Equipment. Equipment that is regulated by the Florida Department of Health because it is capable of producing ionizing radiation (such as x-ray equipment) or certain types of non-ionizing radiation (such as Class IIIB and Class IV lasers).

D. PROCEDURES:

1. Individuals are required to disclose the details of their hazardous materials procurement, use, storage, security, and disposal measures, in accordance with current EHS policy and procedures.
2. The procurement of hazardous materials is governed by the Florida Poly Purchasing Department. Hazardous materials, restricted or non-restricted, must be purchased with a university purchase order. The purchase of hazardous materials via purchasing card is prohibited unless the charge is tied to a purchase order. For vendors who will not accept purchase orders, please contact the PCard Administrator for guidance.
3. The authorization for individuals to procure, use, or possess restricted hazardous materials is granted by government agencies and is dependent on the conditions listed in permits or licenses. Contact EHS for license and permit information. Classes of restricted hazardous materials and related restrictions include but are not limited to the following:
 - a. Explosive materials – Individuals must have a State of Florida permit and be listed on the University's federal Alcohol, Tobacco, Firearms and Explosives (ATF) license.
 - b. Radioactive materials – Individuals must be listed on the university's Florida Department of Health license.
 - c. Ionizing radiation-producing equipment (analytical and medical) and Class IIIB and IV lasers must be registered with and inspected by the Florida Department of Health.
 - d. Tax-free alcohol (pure 190 proof or 200 proof ethyl alcohol) – Individuals must request permission to purchase on the university's federal ATF permit.
 - e. Chemicals listed on the Department of Homeland Security (DHS) Appendix A Chemicals of Concern- Threshold quantities of Appendix A chemicals must be reported to the DHS and additional security measures may be required.
4. Purchase orders for explosives, radioactive materials, radiation-producing equipment, tax-free alcohol, and select agents must be approved by EHS prior to processing the requisition through the Purchasing Department.
5. EHS shall receive radioactive materials at the Innovation, Sciences & Technology Building. All other types of restricted or unrestricted hazardous materials must be direct delivered to the ordering department's location of use.
6. Once an authorized individual receives a restricted hazardous material, he or she is responsible for the proper use and storage of the material according to specific license or permit conditions. He or she must keep records listing the quantities used and the quantities on hand. Such records are subject to EHS, state, and federal audit on demand with no advance notice.
7. Departments ordering non-restricted hazardous materials must report purchases, final consumption, disposal, or transfer of those materials to EHS on a container-in-container-out basis via the university chemical inventory system.
8. Departments are responsible for ensuring facilities and engineering controls are adequate for the material storage and use, and for maintaining a centralized hard copy repository of Safety Data Sheets stored per building. Purchased and stored quantities should be kept to a minimum. Less hazardous alternatives should be used when available.

9. EHS is responsible for fees related to routine chemical waste disposal and incidental spill materials. Departments are responsible for emergency response fees and other fees or fines incurred due to improper collection, storage, or disposal while such wastes are being generated, accumulated, or stored in their facilities.
10. International Air Transportation Association, and other applicable rules. International shipments may also be subject to federal import and export regulations and require additional approval even if being returned to the country of origin or sponsor. Transfer of materials for personal or non-university related business is prohibited.
11. Donations of chemical, biological, or radioactive hazardous materials that are received by departments or individuals require prior approval from EHS before they are accepted by the person or department receiving the material(s).

POLICY APPROVAL	
Policy No.: FPU-9.0041P	
_____ Initiating Authority	_____ Date
_____ Policies & Procedures Review Committee Chair	_____ Date
_____ President/Designee	_____ Date
Approved by FPU BOT, if required	_____ Date
EXECUTED SIGNATURE PAGES ARE AVAILABLE IN THE OFFICE OF THE GENERAL COUNSEL	