



## MEMORANDUM

December 11, 2017

To: TIAER - James Hunter, Ruth Brannon  
FINE ARTS – Dr. Kelly Lemmons, Sara Simpson  
ENGINEERING TECHNOLOGY – Dr. Billy Gray, Shawna Thomas  
SSC – Ricky Demalade, Austen Edwards, Mark Garner  
HYDROLOGY – Dr. Denise Martinez, Shelly Wakefield  
FARM – Allan Morgan, Kim Hart  
CLINICAL LAB SCIENCES – Dr. Sally Lewis, Dr. Dave Telgenoff  
NURSING – Dr. Susan Rugari, Amanda Holland

From: Kent Styron  
Director of Risk Management & Compliance

Subject: **Annual Chemical Inventory Request**

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In order to comply with Texas Department of State Health Services (DSHS) Hazard Communication workplace regulations and reporting requirements, Tarleton State University must accomplish the following tasks regarding the compilation of annual chemical inventories.

### **Hazardous Chemicals Physical Inventory**

Annual inventories are required by the DSHS. Since most Tarleton departments have conducted a physical inventory of chemicals on-hand for the past several years and a base inventory is now established, annual updates should be reasonable to maintain accurately.

Please follow the guidance below in completing the annual chemical inventory for your area:

- Reference Attachment A, Work Area Chemical Inventory Form for recording all chemical inventories. (Do not change the formatting of this form in any manner)
- Report all chemical quantities in **pounds**.
- Examine the enclosed “Steps for Chemical Inventory & TIER II Reporting”, Attachment B, and see form changes, before completing.
- Inventory data is to be accumulated by **work area location** (each building/floor/department is a separate work area).
- If you already have your information on computer, an update is acceptable. The chemical inventories should be completed and returned by **January 19, 2018**.
- Provide notification to the Office of Risk Management & Compliance if you possess in inventory or intend to procure any of the chemicals listed in Attachment C.

Please contact Cindy Jordan at x9237 to request a copy of previous years’ data applicable to your department in electronic form. If you would like your chemicals bar coded to simplify the inventory process contact Hector Davis at x9842. This effort can be performed prior to the next reporting period (December 2018).

Your cooperation in this matter is appreciated.



**If you have questions or additional information is needed please contact me at x9898.**

cc: Dr. Steve Damron  
Dr. James Pierce  
Ms. Kelli Styron  
Dr. David Weissenburger

WKS: ckj



ATTACHEMENT B  
STEPS FOR CHEMICAL INVENTORY & TIER II REPORTING

All hazardous chemicals (**regardless of the quantity**) must be listed on the **Work Area Chemical Inventory Form**. The hazardous chemicals or products shall be listed by the name that is on the label and on the MSDS. This form must be updated and available by November 30 of each year or upon request. Each Department shall maintain a copy of each inventory form and these shall be readily accessible to employees. **Complete one form per work area. Duplicate forms as necessary to list all hazardous chemicals present in the work area. Place all appropriate information on the form in the space provided.**

- (1) **Chemical Name(s)** – If you are reporting a pure chemical, place the chemical name in this column. If you are reporting a mixture of chemicals, place as many of the chemical names (as shown on the MSDS) as you can in the space provided. When reporting a mixture with a generic name, such as gasoline, diesel, kerosene, etc., the individual ingredients do not have to be listed. If the product you are reporting has a trade secret formula, the generic name (provided on the MSDS) may be used, such as “petroleum distillates.” If the MSDS does not provide a generic chemical name, the words “Trade Secret” may be used.
- (2) **Common Name/Product Name** – Place in this column the trade name, brand name, or the company’s code name for the substance. If it is a mixture, place the ingredients in the **Chemical Name** column as well.
- (3) **CAS Number** – Place the Chemical Abstract Service (CAS) Number of the substance in this column. If the substance/mixture does not have a CAS Number, place the CAS Number of the primary hazardous ingredient.
- (4) **Container Type** – Use one or more of the following letters in this column to describe the storage container for the hazardous chemical.

- |                              |               |                         |
|------------------------------|---------------|-------------------------|
| A. Above Ground Tank         | H. Carboy     | N. Glass Bottles/Jugs   |
| B. Below Ground Tank         | I. Silo       | O. Plastic Bottles/Jugs |
| C. Tank Inside Building      | J. Fiber Drum | P. Tote Bin             |
| D. Steel Drum                | K. Bag        | Q. Tank Wagon           |
| E. Plastic/non-metallic drum | L. Box        | R. Rail Car             |
| F. Can                       | M. Cylinder   | S. OTHER                |

- (5) **Chemical Hazards** – Use one of the following Roman numerals in this column to describe the **primary hazard category** for the hazardous chemical. These categories are defined using key words (italicized) found on either the product label or the MSDS.

**I** – Fire Hazard – includes products which are *flammable, combustible liquid, pyrophoric*, and/or an *oxidizer*.

**II** – Pressure Hazard – includes products which are *explosive or compressed gases*.

**III** – Reactivity Hazard – includes products which are *unstable reactives, organic peroxides*, and/or *water reactive*.

**IV** – Acute (immediate) Health Hazards – includes products which are *highly toxic, corrosive, toxic, irritants, sensitizers*, and other hazardous chemicals which cause an *adverse effect to a target organ within a short period of time*.

**V** – Chronic (delayed) Health Hazard – Includes products which are carcinogens, mutagens, or teratogens, and other hazardous chemicals which cause an adverse effect to a target organ after a long period of time

- (6) **Quantity or Amount** – Place in this column the maximum amount (in pounds) of each hazardous chemical stored on any one day during the year. To convert liquid measure to pounds: **number of gallons times Specific Gravity of chemical times 8.3 pounds/gallon** (the density of water). To convert gas measurements to pounds, you will need to obtain the conversion factor (for cubic feet to pounds) for the individual chemical.

**Appendix C Sorted by Security Issue - SABOTAGE, in Order of STQ Amounts**

**GUIDANCE:**

**\* Beware that three of the chemicals may be EPA listed hazardous wastes.**

Chemicals of Interest (COI)	Synonym	Chemical Abstract Service (CAS) #	Release		Theft		Sabotage			
			Minimum Concentration (%)	Screening Threshold Quantities (in pounds)	Minimum Concentration (%)	Screening Threshold Quantities (in pounds unless otherwise noted)	Minimum Concentration (%)	Screening Threshold Quantities	DOT Hazard Code	Placard Amount (lb)
Acetone cyanohydrin, stabilized (EPA Haz Waste Code P069)		000075-86-5					ACG	APA	6.1 PIH	any amt
Aluminum phosphide (EPA Haz Waste Code P006)		020859-73-8					ACG	APA	4.3	any amt
Boron tribromide		010294-33-4			12.67	45	ACG	APA	8, PIH	any amt
Bromine pentafluoride		007789-30-2					ACG	APA	5.1, PIH	any amt
Bromine trifluoride		007787-71-5			6	45	ACG	APA	5.1, PIH	any amt
Calcium phosphide		001305-99-3					ACG	APA	4.3	any amt
Chlorine dioxide	[Chlorine oxide, (ClO <sub>2</sub> )]	010049-04-4	1	1,000			ACG	APA	5.1	any amt
Chloroacetyl chloride		000079-04-9					ACG	APA	6.1 PIH	any amt
Chlorosulfonic acid		007790-94-5					ACG	APA	8, PIH	any amt
Lithium amide		007782-89-0					ACG	APA	Not listed	any amt
Lithium nitride		026134-62-3					ACG	APA	4.3	any amt
Magnesium phosphide		012057-74-8					ACG	APA	4.3	any amt
Methyldichlorosilane		000075-54-7					ACG	APA	4.3	any amt
Phosphorus oxychloride	[Phosphoryl chloride]	010025-87-3	1	5,000	80	220	ACG	APA	8, PIH	any amt
Phosphorus trichloride		007719-12-2	1	15,000	3.48	45	ACG	APA	6.1 PIH	any amt
Titanium tetrachloride	[Titanium chloride (TiCl <sub>4</sub> ) (T-4)-]	007550-45-0	1	2,500	13.33	45	ACG	APA	8, PIH	any amt
Trichlorosilane	[Silane, trichloro-]	010025-78-2	1	10,000			ACG	APA	4.3	any amt
Sulfuryl chloride		007791-25-5					ACG	APA	8	any amt
Phosphorus pentasulfide (EPA Haz Waste Code U189)		001314-80-3					ACG	APA	4.3	any amt
Potassium phosphide		020770-41-6					ACG	APA	4.3	any amt
Sodium phosphide		012058-85-4					ACG	APA	4.3	any amt
Strontium phosphide		012504-16-4					ACG	APA	4.3	any amt