18 December 2002

MEMORANDUM

From: Safety and Occupational Health Manager

Subj: SAFETY REVIEW OF PURCHASES

Ref: (a) OPNAVINST 5100.23F

Encl: (1) Requirements for the Procurement and Storage of Hazardous Materials
(2) USNA-DME 5100/28 Hazardous Materials Approval Request

1. All purchases of supplies, tools and industrial equipment which may have an impact on the safety and health of personnel or the protection of property must be made with consideration given to the highest level of safety. Many hazards can be eliminated or reduced by the application of state-of-the art safety design. Managers and supervisors should look for maximum safety features, the lowest possible noise exposure, machinery guarding, adequate loading, standards compliance (e.g., UL, ANSI, etc.) and excellent ergonomics.

2. Per reference (a), individuals responsible for purchase specifications and requests must coordinate with the Safety Department to ensure that NAVOSH requirements are met. This applies to purchases of any dollar amount, including transactions made with a Government Purchase Card.

3. The following is a list of items requiring mandatory Safety Department review:

a. All Personal Protective Equipment, e.g., eye protection, gloves, disposable coveralls, ear plugs and muffs. Note: The Safety Department supplies respiratory protection equipment to most employees as required. **With the exception of the Fire Department, PWD Work Center #10 and the Asbestos Removal Team, USNA Cost Centers are not authorized to purchase respirators (including disposable masks)**.

b. All Power Tools and Industrial Extension Cords

c. Electrical Appliances (including portable heaters)

d. Ladders and Scaffolding

e. Fall Protection Equipment

f. Machinery, both portable and for permanent installation, including fuel powered equipment.

g. Lock-out/Tag-out Devices

4. Hazardous Materials: All purchases of new hazardous materials (chemicals) must be approved by the Safety Department. Hazardous materials procurement requirements and procedures are provided in enclosures (1) and (2).

5. Ergonomics Reviews: Supervisors should coordinate with the Safety Department to perform an ergonomic evaluation of proposed purchases of office workstations, keyboard systems and seating. The Federal Prison Industries (UNICOR) and commercial vendors carry many products with marginal to excellent ergonomics. All furniture purchases from commercial sources require either a UNICOR waiver or market research documentation showing that UNICOR items are not comparable in price, timeliness and/or quality. The Safety Department has information on reliable ergonomic suppliers and USNA locations with exceptional ergonomic workstations. We can advise departments on the selection of furniture from UNICOR, or assist with the waiver process and market research if UNICOR cannot meet the user's needs.

6. Safety Review Procedures:

a. When researching a proposed purchase, provide the Safety Department (Stop 18b or FAX 3-4849) with a copy the draft purchase order or product information. Website information is acceptable. Typical turnaround time will be one workday or less. Ergonomics evaluations and complex reviews may take up to several days.

b. The Safety Department evaluation will be provided by either handwritten signature/remarks on the purchase request form, by memoranda, or by e-mail.

c. If an item is deemed "not recommended" for safety and health reasons, the Safety Department staff will assist supervisors in identifying and locating approved alternatives.

d. Safety Department review documentation must accompany purchase request forms forwarded to the Supply Department.

7. If you have any questions, I can be contacted at extension 3-5665 or by e-mail at agriesti@usna.edu

STEVEN AGRIESTI

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Requirements for the Procurement and Storage of Hazardous Materials (HM)

1. The Consolidated Hazardous Material Reutilization Inventory Management Program (CHRIMP) facility, otherwise known as HAZMIN Center, is the focal point for all hazardous materials control matters.

2. The HAZMIN Center maintains all HM data in the Hazardous Substance Management System (HSMS) software program. The program enables the development of an accurate Authorized Use Listings (AUL). The AUL identifies all like HM under a single AUL number.

3. Supervisors are responsible to ensure that Material Safety Data Sheets (MSDS) are available in work unit locations for all items typically used by their shops. The HAZMIN Center will issue MSDS for all AUL items. The Safety Department will assist supervisors in ensuring MSDS books are organized and kept up-to-date.

4. Departments/work centers may only purchase and use HM listed on the AUL. Procurement of new products or HM not on the AUL will require appropriate Safety and Environmental approval. Request for such approval must be forwarded to the Safety Department on enclosure (2), Hazardous Materials Approval Request form.

5. HM procurement guidance is as follows:

a. The types of HM listed below must be ordered through the HAZMIN Center. These products will be received by and stored at the HAZMIN Center when not in use. Although properly approved and listed on the AUL, such items **cannot be purchased with Government Purchase Card**.

- -Paints (including aerosols)
- -Solvents
- -Oils, Greases, and other Lubricants
- -Concentrated (industrial strength) Cleaners
- -Adhesives, Epoxies and Sealants
- -Compressed Gases
- -Flux and Metal Prep Products
- -Products containing Acids, Alkalis, or Corrosive Components.
- -Any industrial Grade Products with "Flammable" or "Combustible" on the Warning Label
- -Large Quantities of Cleaning Products

b. The following types of HM will be stored in bulk in the ordering department/work center, but must be ordered through the HAZMIN Center. These items also **cannot be purchased with a Government Purchase Card**.

- Pest and Plant Control Chemicals (i.e., Pesticides, Herbicides, Fungicides, Insecticides, etc)
- Water, Pool, and Sewage Treatment Chemicals
- Laundry and Dry Cleaning Chemicals
- Fertilizers, Lime and Bulk Vegetation Food Chemicals
- Photo Processing Chemicals

c. The following categories of HM are not regulated under CHRIMP and do not require Safety Department review and approval. Many are considered low-hazard or non-hazardous products. They will not be procured through, or stored in the HAZMIN Center and are not listed on the USNA AUL.

- Household Cleaners and Disinfectants in Small Quantities (one case or less)
- Polishes (Furniture, Shoe Polish, etc.)
- Building Plaster
- Household-type Deodorants
- Soaps and Hand Cleaners
- Toner Cartridges/Ink
- Wax (Floor, Vehicle, etc. in small quantities))
- Batteries up to 12 Volts
- Correction Fluids (e.g., White Out, etc.)
- Joint Compounds/Spackle
- Building Concrete/Cement
- Welding Rods
- Treated Grass Seeds and Mulch

d. Normal quantities of Laboratory grade chemicals (non-industrial HM) used in the academic laboratories need not be procured through the HAZMIN Center. Such chemicals are to be purchased through established Navy supply procedures. However, receipt and usage of these chemicals must be reported to the HAZMIN Center for EPA reporting purposes. Purchase approval by the Safety Department is not necessary for these items.

5. Questions regarding the USNA Hazardous Material Control and Management Program should be addressed to Maurice Sumner at extension 3-5663, e-mail: sumner@usna.edu, or to Steve Agriesti at extension 3-5665, e-mail: agriesti@usna.edu.