



**University of Alaska Anchorage  
Facilities & Campus Services  
Support Services Group  
3211 Providence Drive, ULB 100F  
Anchorage, AK 99508  
Office: 907-786-1351 Fax: 907-786-1391  
E-mail: [trig@uaa.alaska.edu](mailto:trig@uaa.alaska.edu)  
Website: [www.uaa.alaska.edu/ehsrms](http://www.uaa.alaska.edu/ehsrms)**

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Dear Colleague,

In light of the 9-11 tragedy, I am writing to remind you that there is currently a university prohibition on using the procard for hazardous material purchases. This prohibition is necessitated by the many federal, state and local regulations that require us to track our hazardous material inventories and review orders for prohibited or questionable items. Use of the procard doesn't allow us to do this on Banner. This prohibition has been in place several years, and thus predates the events of September 11, 2001. However, both existing and new proposed legislation require all of us to be able to track all hazardous materials and hazardous waste transactions carefully and completely.

I understand that it is often difficult for most people to consistently define what a hazardous material is. The best guideline that I can offer is if a vendor provides a material safety data sheet (MSDS) on a particular product then that product is defined as a hazardous material under the OSHA codes. I realize that this definition will include many innocuous chemicals like sodium chloride (table salt) and sucrose (sugar) when ordered as chemical reagents. On the other hand, it will catch most of the really nasty chemicals.

Another problem occurs when using the procard for chemical orders. The chemical suppliers forward MSDSs to my office for review and distribution to the ordering departments and individuals. When those arrive, there is no indication of who placed the order as the credit card number is blocked-out for security purposes. Procurement Services and I then spend large amounts of time researching both Banner and the vendors' databases to identify the origin of these orders. This delay presents all of us with regulatory compliance concerns and can jeopardize our research grant funding.

In the near future, I expect some strong federal regulations to be promulgated that will severely restrict how we order our chemicals. The purchase order system that we currently have in place seems to be compatible with the authorization process required by most of the suggested legislation. With this in mind, I ask that you use the purchase order system to place all your orders for chemical reagents and hazardous materials. For more information on that process, please contact Barbara Charbonneau in Procurement Services at 786-6504.

Hazardous waste disposal is a separate issue and only the EHS office is authorized to dispose of hazardous waste for the Anchorage area campus and sites. Extended campuses should follow their established procedures. Please contact me at 786-1351 if you have any hazardous waste disposal questions.

Your assistance and cooperation is greatly appreciated and I apologize for any inconvenience that this may cause you.

Trig Trigiano, Director  
UAA EHS/RMS