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Background

Cradle-to-grave management and tracking of laboratory chemicals is required by various regulations and enforced by City, County, State, and Federal regulators. This requires that chemicals be managed and tracked beginning with receipt on-site, during storage and use in laboratories, and ending with ultimate disposition through consumption or disposal as chemical waste.

Cradle-to-grave management of chemicals is currently performed in a disconnected and incomplete manner which requires: 1) EH&S to inventory all chemicals shipped to UNR at the Central Receiving building, 2) Central Receiving to deliver all incoming chemicals to mail stops, 3) EH&S to inventory each laboratories’ chemical containers on an annual basis, and 4) EH&S to dispose of and track all outgoing chemical waste.

With the approval of UNR administration, the Environmental Health and Safety (EH&S) Department is expanding the chemical inventory to include chemical package delivery directly to the room(s) where chemicals are used and stored. Simultaneously, EH&S will begin picking up empty chemical containers for disposal from their rooms of use.

Implementation of a cradle-to-grave chemical management program will: (a) eliminate spills/leaks of chemical packages in administrative areas, (b) reduce the frequency of lab visits and container handling during the current annual “physical in-lab” inventory process, (c) improve the accuracy of the campus chemical inventory by creating a nearly “living” inventory as opposed to the current static inventory that is only updated once per year, and (d) improve the accuracy of specific inventory snapshots obtained for generating regulatory reports for building construction and remodeling permitting needs.

The current annual in-lab inventory will continue until the daily delivery and empty pick-up program has been fully implemented across the campus, at which point the frequency of annual visits can be reduced depending on the quantity and inventory turnover per area.
Chemical Package Delivery: Instructions

Continue to purchase chemicals as per current practices. You will need to provide EH&S with your name and the specific building and room location where your chemicals are stored, this will be the delivery location for your chemical packages. Other contact information (phone, email) will need to be provided to EH&S in the event you need to be contacted regarding package delivery. EH&S will provide your department with instructions on how to communicate this information. To facilitate delivery accuracy, you should ask your chemical supplier to complete the “ship to” labels as suggested in this document. Incomplete or incorrect package labeling may cause delays in delivery, as EHS will need to investigate where to deliver your package. If you have more than one delivery location, please see more specific information in the questions and answers in this document. Cryogenic and very large gas cylinders are excluded from this program and will not be handled by EH&S staff, although they will be inventoried during the “physical in-lab” inventory.

Empty Container Pick-up and removal from rooms/labs: Instructions

Once chemical delivery and empty container pick up is initiated in your department or building, please discontinue discarding empty bar coded empty containers in regular trash cans. You can place your empty, bar coded chemical containers next to you chemical/hazardous waste containers and the empties will be removed by EH&S staff when they remove your hazardous waste. Also, if any EH&S staff member is in your lab area for any reason, you can ask them to remove your empty containers; however, due to scheduling or inability to safety transport the containers, they may not always be able to remove your empty containers at that time. If your empty containers cannot be picked up by one of these methods, use the on-line form on the EH&S web site to submit an “Empty Chemical Container Pickup” request to have empty containers removed from your lab or room.

Please note, there are no changes to existing procedures for chemical and hazardous waste disposal, just for empty container disposal.

Exceptions

- EH&S will not deliver chemicals to Stead SAGE, Main Station Farm or Redfield campus areas.
- EH&S will not deliver cryogenics liquids or large gas cylinders.
- Initially EH&S will not deliver items shipped on dry ice. However, after the program has been implemented across the entire UNR campus, EH&S will re-consider delivering items on dry ice.
- EH&S will not deliver insects, animals or other items marked as biological material.
- Initially EH&S will not deliver chemicals to Facilities Operations and Maintenance areas, but the program may be expanded to include these areas after it is fully established in academic laboratories.
Chemical Package Delivery: Common Questions and Answers

- Which packages will EH&S deliver?
- What do the UNR Bar Codes look like?
- Where will EH&S deliver chemical packages?
- Which packages will Central Receiving continue to deliver (to mail stops)?
- Whom do I contact with questions about tracking package delivery at UNR?
- How will EH&S know where to deliver chemical packages?
- How will EH&S track chemical package deliveries?
- How can I track the delivery status of my chemical packages?
- What if the recipient (the “ship to” person) is not present when EH&S tries to deliver packages?
- What if a package is delivered to UNR with no “ship to” name and no mail stop number?
- What if a chemical package is delivered with no “ship to” name, but has a mail stop and or a department name?
- How should chemical packages be addressed to expedite shipping?
- Our research group or the Faculty I work for is changing buildings or rooms, how can I ensure my package delivery address gets updated to the new location?
- I work for two different faculty or departments, how can I ensure my package gets delivered to the correct one?
- The group or faculty person I work for has multiple rooms with chemical usage and storage. How will EH&S know where to take the package?
- Will EH&S deliver cryogenic liquids?
- Will EH&S deliver large compressed gas cylinders?
- Will EH&S deliver items that are shipped packed on dry ice?
- Will EH&S deliver insects, animals, or other biological items?
- I paid extra for express overnight delivery of my chemicals. Will they be delivered to me the same day they arrived at UNR?
- Will items shipped as standard or ground shipping be delivered to rooms the same day they are delivered to UNR?
- We add our newly delivered chemicals to the ChemTracker database ourselves. Should we continue to do this?
- We purchase chemicals from ChemStores, how do we get those added to our inventory in ChemTracker?

Empty Container Pick-up and removal from rooms/labs: Common Questions and Answers

- Are we required to use the on-line form to request empty containers be removed?
- Are there specific empty containers that EH&S will pick up from labs/rooms? Are there containers EH&S will not pick-up?
- Can I dispose of empty chemical containers in the blue plastic recycling bins located in hallways?
- What if I break a bottle that has been bar coded, what do I do?
- Can we re-use empty containers?
- There is a residual amount of the chemical in the bottle, is this considered empty?
- Should I evaporate liquids to the atmosphere to empty out containers containing liquids?
Should I remove the UNR Bar Code stickers off of bottles?

- We use ChemTracker to manager our chemical inventory on a regular basis, will we need to change our procedures?
- We input specific storage locations names within rooms in ChemTracker to know where to find chemicals. Will EH&S add this information to our inventory database after the item is delivered?
- We delete empty chemical containers from our inventory in ChemTracker. Should we continue to do this?
- Will EH&S deliver items purchased from the UNR Chemstores?
- Do I need to notify EH&S of chemicals purchased from Chemstores?
- Whom should I contact with questions or issues involving shipments of packages?
- Whom should I contact with questions about the chemical inventory program?
- Does this program include areas like Stead SAGE (NTF), Main Station Farm or Redfield areas?
- Does this program include the buildings on Valley Road?
- Does this program include non-lab areas such as Facilities Services, Motorpool, Custodial Services, and other similar type areas?
- What do I do if I receive a chemical that hasn't been intercepted and bar-coded but should have been?
- I want to use ChemTracker to look at my chemical inventory on-line? How do I get a ChemTracker user account?
- What is ChemTracker?
Chemical Package Delivery: Common Questions and Answers:

- Which packages will EH&S deliver?
  - Any packages containing chemicals that EH&S inventories at Central Receiving. In other words, only those packages for which EH&S applies a UNR Bar code sticker. Top of Page

- What do the UNR Bar Codes look like?
  - All UNR Bar Codes are white stickers with black lines and numbers in three sizes. All have seven digits; each bar code number is a unique number. Pictures of the UNR Bar codes are shown below. Top of Page

- Where will EH&S deliver chemical packages?
  - EH&S will deliver chemical packages directly to the rooms where the items will be used and stored. Top of Page

- Which packages will Central Receiving continue to deliver (to mail stops)?
  - All packages not handled or inventoried by EH&S. In other words, anything that EH&S does not bar code. Top of Page

- Whom do I contact with questions about tracking package delivery at UNR?
  - Contact the Central Receiving at 784-4988 or use the on-line tracking page https://packtrack.unr.edu/sclintra/

- How will EH&S know where to deliver chemical packages?
  - EH&S will establish and maintain a database that associates people (the “ship to” person) with room locations where they store and use chemicals. Top of Page

- How will EH&S track chemical package deliveries?
  - EH&S will use handheld electronic devices to track package delivery. All package shipping activity can be monitored on-line (https://packtrack.unr.edu/sclintra/).

- How can I track the delivery status of my chemical packages?
  - After your package has been delivered to UNR, go to the on-line package tracking application (https://packtrack.unr.edu/sclintra/) and input the shipping tracking number in the EHS Hazmat/Chemical Tracking quick search box (bottom half of the page). If you cannot find a record of your item, try the UNR non-hazmat tracking search on the same page (top half).

- What if the recipient (the “ship to” person) is not present when EH&S tries to deliver packages?
  - If the “ship to” person is not present at the delivery drop-off point, EH&S will ask other people in the same room (if present) to sign for the package. If no one is present in the room, EH&S staff will drop the packages off in the room and sign for delivery. Top of Page
What if a package is delivered to UNR with no “ship to” name and no mail stop number?
- The package will not be accepted by Central Receiving and will be returned to the sender. All packages delivered to UNR are first received by Central Receiving before transferring the custody of chemical packages to EH&S. Central Receiving is the primary group who determines if packages can be accepted from the shipping companies. Top of Page

What if a chemical package is delivered with no “ship to” name, but has a mail stop and or a department name?
- The package will be accepted by Central Receiving and transferred to EH&S custody; however, delivery will be delayed until the department can be contacted and the “ship to” recipient can be determined. Top of Page

How should chemical packages be addressed to expedite shipping?
- We suggest you label as shown (if the supplier shipping label can support it); however, the basic minimum is a full name and mail stop number:

Your Name, building abbreviation room number (see UNR campus map)
Your Department/MS #, or “Mail Stop”
University of Nevada Reno
1664 N. Virginia Street
Reno, NV 89557

Jane Doe, HMS 202
Microbiology/Mail Stop 0320
University of Nevada Reno
1664 N. Virginia Street
Reno, NV 89557

John Doe, CB 205
Chemistry/MS 0216
University of Nevada Reno
1664 N. Virginia Street
Reno, NV 89557

If your package is labeled as shown below, delivery will be delayed or possibly rejected by Central Receiving, until the specific person and delivery location can be determined:

Chemistry Department
University of Nevada Reno
Reno, NV 89557

John [with or without full name]
University of Nevada Reno
Reno, NV 89557

Our research group or the Faculty I work for is changing buildings or rooms, how can I ensure my package delivery address gets updated to the new location?
- Inform EH&S inventory staff of the change when they drop off your package and/or send a message to the EHS Chemical Inventory Specialist at chestonc@unr.edu. Top of Page

I work for two different faculty or departments, how can I ensure my package gets delivered to the correct one?
- Assuming you work for two different departments with different mail stop addresses, inclusion of the mail stop number will ensure proper delivery. If possible, include the building and room information on the shipping label as shown above.
- If you are in a situation not described in this document, please contact the Chemical Inventory Specialist at chestonc@unr.edu. Top of Page
• The group or faculty person I work for has multiple rooms with chemical usage and storage. How will EH&S know where to take the package?
  o Inform the EH&S staff member who is delivering your package your preferred delivery location.
  o Or, contact the Chemical Inventory Specialist at chestonc@unr.edu with your preferred delivery location.
  o Or, after the package is dropped off, inform EH&S of the items final location by sending the bar code number and room location to the EH&S Chemical Inventory Specialist at chestonc@unr.edu.

• Will EH&S deliver cryogenic liquids?
  o No. Cryogenic liquids are delivered by the supplier directly to their rooms of use. These procedures will not change.  Top of Page

• Will EH&S deliver large compressed gas cylinders?
  o No, EH&S will not deliver large compressed gas cylinders. In the Chemistry Building, large compressed gas cylinders are delivered to ChemStores and individual research groups move them to their labs when they purchase them from ChemStores. These procedures will not change.
  o For the rest of the UNR campus, large compressed gas cylinders containing commonly used gases (air, nitrogen, carbon dioxide, etc.) are delivered by the supplier directly to their rooms of use. These procedures will not change.
  o Smaller gas bottles, and specialty mix custom gases usually do come through Central Receiving and will be delivered by EH&S.  Top of Page

• Will EH&S deliver items that are shipped packed on dry ice?
  o Initially no. However, after the program has been implemented across the entire UNR campus, this topic will be revisited after determinations are made to ensure the additional workload can be accommodated, and that temperature sensitive items will not be compromised by the process.  Top of Page

• Will EH&S deliver insects, animals, or other biological items?
  o No.  Top of Page

• I paid extra for express overnight delivery of my chemicals. Will they be delivered to me the same day they arrived at UNR?
  o Yes. Overnight or rush delivery items will be identified by the exterior markings on the shipping label and will be given first priority for inventory processing so that they can be delivered the same day.
  o Exceptions may occur if express items are delivered to UNR late in the business day (after 2PM), or if the address label is incorrectly or incompletely filled-out.  Top of Page

• Will items shipped as standard or ground shipping be delivered to rooms the same day they are delivered to UNR?
  o All items delivered to UNR before 11:00 am will be delivered to the final destination the same day. Items delivered to UNR after 2 PM may be held over for delivery until the next day.  Top of Page

• Can we add newly delivered chemicals to ChemTracker ourselves?
o No, this is not necessary. EH&S staff will electronically add new chemicals to your faculty’s inventory in the building and room they were delivered to. ChemTracker will be updated the afternoon of the same the day after all chemicals deliveries have been completed.
o EH&S recommends that you confirm you can see your new chemicals in ChemTracker by logging in and searching for them at the end of the day, or the next day, after they were delivered.
o If you can’t find delivered items in your inventory in ChemTracker, contact the Chemical Inventory Specialist at chestonc@unr.edu. Also contact the chemical inventory group if any changes (room number, storage location, etc.) are needed for your delivered chemicals. An EH&S staff member will reply when the changes have been made.

- We purchase chemicals from ChemStores, how do we get those added to our inventory in ChemTracker?
  o Send and email to the Chemical Inventory Specialist at chestonc@unr.edu with the building and room where the item will be stored and your inventory will be updated by and EH&S staff member. You will be provided with the ChemTracker Inventory Management that you can use repeatedly for these types of requests.
**Empty Container Pick-up and removal from rooms/labs: Common Questions and Answers**

- **Are we required to use the on-line form to request empty containers be removed?**
  - No. If you have hazardous/chemical waste that you have requested to be picked up, just place your empty containers next to the hazardous waste containers. EH&S staff will remove the empties when they remove the hazardous waste containers. [Top of Page]

- **Are there specific empty containers that EH&S will pick up from labs/rooms? Are there containers EH&S will not pick-up?**
  - Only containers that have been bar coded by EH&S with the UNR bar code sticker need to be picked up by EH&S.
  - Empty containers that are not bar coded can be disposed of in the regular trash or as lab trash. [Top of Page]

- **Can I dispose of empty chemical containers in the blue plastic recycling bins located in hallways?**
  - No. The blue plastic recycle bins are for recycling beverage containers only.
  - Recycling companies will not accept glass or plastic chemical containers, even if they have been thoroughly rinsed and cleaned. [Top of Page]

- **What if I break a bottle that has been bar coded, what do I do?**
  - If a spill occurs and EH&S responds to clean up, the bar code will be recorded by EH&S and the container will be removed from the inventory database.
  - If a spill occurs and the clean-up is managed by the room occupants, the broken bottle can be disposed in a “Lab Trash” waste container. You can report the bar code number of a broken bottle to the Chemical Inventory Specialist at chestonc@unr.edu. [Top of Page]

- **Can we re-use empty containers?**
  - In general, EH&S discourages the re-use of empty chemical containers but **yes**, you can. You will need to provide EH&S with the bar code number from empty containers so it can be removed from the inventory database. Email the Chemical Inventory Specialist at chestonc@unr.edu with the UNR bar code number for each container you are going to reuse.
  - If you re-use chemical containers, please appropriately re-label them to accurately describe the contents and their hazards.
  - Please do not remove the UNR bar code stickers on re-used containers, instead cross out the bar code stickers with a black marker, which will be a visual indicator for EH&S staff not to inventory re-used containers during lab inventory visits. Examples of crossed out bar codes are shown below. [Top of Page]
Examples showing how to cross out bar code stickers on containers that will be re-used.

- Do not re-use containers that contained U.S. Federal Environmental Protection Agency (EPA) Resource Conservation and Recovery Act (RCRA) “P listed” chemicals. They are identified with a yellow sticker titled “ACUTELY TOXIC CHEMICAL” (picture below). These containers need to be submitted as hazardous waste even when they are empty. Top of Page

Do not re-use containers which a yellow sticker titled “ACUTELY TOXIC CHEMICAL”.

- There is a residual amount of the chemical in the bottle, is this considered empty?
  - Yes, containers are considered empty if no more chemical comes out freely when the container is turned upside down, even though a small residual amount may remain inside. Top of Page

- Should I evaporate liquids to the atmosphere to empty out containers containing liquids?
  - No. Disposal of chemicals by evaporation is a violation of UNR’s Air Emissions permit as specifically stated in the Additional Conditions item #3: “Waste materials containing volatile chemicals shall not be disposed of by evaporation to the atmosphere”. A container with a small residual amount of liquid is considered empty and should be capped and submitted to EH&S for pick-up. Top of Page
Should I remove the UNR Bar Code stickers off of bottles?
- No. If you are going to re-use the container follow the instructions in the “can we re-use empty containers” section.
- If a container is broken follow the instructions in the “what if I break a bar coded bottle” section. If you are reusing a bottle for any reason the contents of which do not need to be inventoried, please just cross out the bar code sticker with a pen.
- If you are not sure, or have a circumstance not described in this document, please contact the chemical inventory staff at chestonc@unr.edu.

We use ChemTracker to manager our chemical inventory on a regular basis, will we need to change our procedures?
- Yes, but things will become easier. EH&S will manage the electronic inventory database by electronically transferring delivered items to the building and room they were delivered to. EH&S will also delete empty containers from the database after they have been picked up. You will no longer need to add and remove your containers, EH&S will do this for you.

We input specific storage locations names within rooms in ChemTracker to know where to find chemicals. Will EH&S add this information to our inventory database after the item is delivered?
- Yes but you need to email the chemical inventory staff at chestonc@unr.edu with the UNR Bar Code number and the name of the storage location in the lab/room. EH&S can provide you with a floor map of your room listing the names of the storage locations.
- If you do not have a map of your room showing chemical storage areas, contact the chemical inventory staff at chestonc@unr.edu.

We delete empty chemical containers from our inventory in ChemTracker. Should we continue to do this?
- No. EH&S staff will delete all the empty containers from ChemTracker that get picked-up. However there may be some lag time if empty containers are not specifically requested to be picked up.
- To expedite empty container pick up, use the on-line waste forms on EH&S’s web site and pick the “Empty Chemical Container Pickup” button.

Will EH&S deliver items purchased from the UNR Chemstores?
- No. EH&S does not have sufficient staff to be involved with the transfer of chemicals purchased from the UNR Chemstores.

Do I need to notify EH&S of chemicals purchased from Chemstores?
- No this is not required, but it is encouraged.
- If your research group voluntarily maintains its chemical inventory and needs to track ChemStores purchases, simply email the UNR Bar code and the building and room information to the chemical inventory staff at chestonc@unr.edu and the database will be updated appropriately. You will be provided with an excel spreadsheet template that you can use repeatedly for these types of requests.

Whom should I contact with questions or issues involving shipments of packages?
- Contact the Central Receiving at 784-7988.

Whom should I contact with questions about the chemical inventory program?
• For questions, comments or suggestions regarding chemical inventory management processes contact Luis Barthel-Rosa, the Manager, Chemical Management Services at 327-2270. 

• Does this program include areas like Stead SAGE (NTF), Main Station Farm or Redfield areas?
  o No. 

• Does this program include the buildings on Valley Road?
  o Yes, but only to UNR affiliates, research groups, and staff. Non-university entities and outside agencies are not included.

• Does this program include non-lab areas such as Facilities Services, Motorpool, Custodial Services, and other similar type areas?
  o Initially no, but the program may be expanded to include these areas in the future.

• What do I do if I receive a chemical that hasn't been intercepted and bar-coded but should have been?
  o Occasionally EH&S staff overlook chemical containing packages. Send an email to the chemical inventory staff at chestonc@unr.edu with your name, the building and room where the chemical is used/stored and a phone number where you can be reached. An EH&S staff member will visit your lab to inventory the item. Please keep the box until after EH&S arrives so that we can better understand why the item was overlooked, but proceed with your use of the item.

• I want to use ChemTracker to look at my chemical inventory on-line? How do I get a ChemTracker user account?
  o Email the EH&S Manager, Chemical Management Services to get your account created.

• What is ChemTracker?
  o ChemTracker is a web-based software program used by EH&S to manage the UNR Chemical Inventory and to generate regulatory reports. The University pays the licensing fees for UNR to use ChemTracker; there are no direct costs to UNR faculty, staff, students or departments.