

Policy 3220

Purchases of Restricted Items

Responsible Office	Procurement	Effective Date	9/15/99
Responsible Official	Executive Director of Procurement	Last Revision	4/7/09

Policy Sections	2
3220.1 Hazardous or Regulated Materials	2
3220.2 Safety-Critical Equipment	3
3220.3 Radioactive Materials.....	4
3220.4 Animals	4
3220.5 Controlled Substances.....	4
3220.6 Non-Taxable Ethyl Alcohol.....	4

Scope

This policy defines restricted items and the guidelines that must be followed for such purchases.

Policy Statement

In the course of their work, University employees, staff, and students routinely use a variety of potentially hazardous materials, safety-critical equipment, radioactive materials, vertebrate animals, and legally controlled substances. The University permits these uses, but only with oversight to ensure safety and compliance with relevant restrictions and regulatory requirements. In addition to the rules governing University procurement as defined in Policy [3201](#) General Purchasing Policy, the purchase of these items therefore involves special rules. University personnel are responsible for following the appropriate procedures defined by this policy.

Due to their critical nature, restricted items may only be ordered through the Purchasing Department or its designee. University purchasing cards, personal credit cards, checks, or cash may not be used to order any of these items.

Definitions

Restricted Items

Items subject to special safety or other regulatory requirements, whose purchase and handling are subject to special procedures. For the purpose of this policy, restricted items include certain highly hazardous materials, safety-critical equipment, radioactive materials, vertebrate animals, controlled substances (i.e., scheduled drugs and certain drug precursors), non-taxable ethyl alcohol and select agents.

Hazardous or Regulated Materials

Materials that present special safety risks during transport, storage, use, or disposal. These include, but are not limited to, certain highly toxic, reactive, or otherwise hazardous chemicals, gases, biological agents, and defective pathogen vectors.

Safety-Critical Equipment

Equipment that can present safety hazards to users (e.g., X-ray and laser equipment) as well as equipment used to control exposures to recognized hazards, and whose improper use could subject users to harm (e.g., fume hoods, biological safety cabinets, respirators, automated film processors).

Radioactive Materials

By-product, source, special nuclear, accelerator produced, Generally Licensed, or naturally occurring material whose purchase and use is licensed by the US Nuclear Regulatory Commission (NRC) and/or the CT Department of Environmental Protection (DEP). These radionuclides may emit alpha, beta, gamma, or X-rays, neutrons or

other emissions. Examples of radioisotopes include, but are not limited to, P-32, S-35, C-14, H-3, and I-125, including sources sold by vendors as “exempt”.

Animals

Any live, vertebrate animal used or intended for use in research, research training, experimentation, biological testing or for related purposes. Examples include, but are not limited to, traditional laboratory animals, farm animals, wildlife, birds and aquatic species.

Controlled Substances

Controlled substances covered by this policy are substances listed by the U.S. Department of Justice, Drug Enforcement Administration (DEA) and/or the Connecticut Department of Consumer Protection, Drug Control Division (i.e., scheduled drugs and certain drug precursors).

Non-Taxable Ethyl Alcohol

Non-taxable high-proof ethyl alcohol is regulated by the federal Bureau of Alcohol, Tobacco, and Firearms.

Requisition

The source document for purchase orders and releases. Requisitions provide a description of customer requirements and are approved by an individual authorized to commit University funds.

Reason for the Policy

This policy is intended to ensure that individuals and departments needing restricted items at the University have the capability to acquire them in compliance with applicable University, state and federal requirements.

Policy Sections

University employees, staff, and students routinely use a variety of potentially hazardous materials in their work. Safe management of these materials is promoted through training and education programs and periodic safety inspections. However, a small subset of these materials requires greater scrutiny for regulatory and safety purposes. To ensure that this oversight is consistently provided without unreasonably interfering with operations and research, the University requires all individuals and departments with a legitimate need to purchase restricted items to do so in accordance with these procurement procedures. If a purchase request is denied, the decision may be appealed through the University Safety Committee, Radiation Safety Committee, Biological Safety Committee, or the Yale Institutional Animal Care and Use Committee (IACUC).

3220.1 Hazardous or Regulated Materials

The Office of Environmental Health and Safety (OEHS) is responsible for approving the purchase, storage, use, and disposal of hazardous and regulated materials. Requests for items requiring prior approval should be mailed or faxed to OEHS, Attention Restricted Items Approval. Requests must be submitted on Form [3220 FR.01](#) Restricted Items Approval Request. Hazardous and regulated materials requiring pre-order approval are listed below.

Hazardous or Regulated Materials Requiring Pre-Order Approval	
<p>Highly Toxic</p> <p><u>Compressed Gases:</u> Arsine Cyanogen Cyanogen chloride Diborane Fluorine Germane Hexaethyl tetraphosphate Hydrogen cyanide Hydrogen selenide Nitric oxide Nitrogen tetroxide Phosgene Phosphine</p> <p><u>Select Agents:</u> Select Agents as defined by CDC/USDA, including many highly infectious organisms and biologically-active toxins</p>	<p><u>Air/Moisture Reactive Metals:</u> Alkali metals Barium Beryllium Cesium Lithium Lithium aluminum hydride Phosphorus Potassium Rubidium Sodium</p> <p><u>Others:</u> Arsenic and arsenic compounds Benzoyl peroxide Cyanide compounds Defective pathogen vectors and vector kits Ethylene oxide Hydrofluoric acid Hydrogen (compressed gas) Mercury-containing compounds/products Perchloric acid Picric acid Uranyl acetate or nitrate</p>

3220.2 Safety-Critical Equipment

The Office of Environmental Health and Safety (OEHS) is responsible for approving the purchase, storage, use, and disposal of safety-critical equipment. Requests for items requiring prior approval should be mailed or faxed to OEHS, Attention Restricted Items Approval. Requests must be submitted on Form [3220 FR.01 Restricted Items Approval Request](#). Ownership of certain equipment (e.g., biological safety cabinets, automated film processors) incurs a mandatory service and maintenance contract to ensure safe and efficient operation. Contact OEHS or Procurement for more information. Safety critical equipment requiring pre-order approval are listed below:

Safety Critical Equipment Requiring Pre-Order Approval
AED or Automated External Defibrillation device Autoclaves Automated film processors Biological safety cabinets Clean Benches (Horizontal or Vertical Laminar Flow) Compressed Gas lecture bottles Compressed Gas manifold delivery systems Cranes and hoists Electron microscopes Emergency eye washes and safety showers Ethylene oxide sterilizers Forklifts and related motorized equipment Fume hoods Gamma counters (or gamma detectors) Glove boxes High Magnetic Field Equipment Lasers - Class 3B/4 Lead aprons Liquid scintillation counters (LSC) Respirators and replacement cartridges and filters Tritium H ³ exit signs X-ray equipment

3220.3 Radioactive Materials

The University's US NRC License permits the use of radioactive materials (RAM) for animal-related and other non-human research, testing, and education purposes. Purchase and use are subject to oversight by the Yale University Radiation Safety Committee (RSC). RSC regulations require that authorized persons may order or arrange to acquire radioactive materials only through the Radiation Safety Section (RSS) of the Office of Environmental Health and Safety. Radioactive material may only be delivered to designated receiving locations. After an incoming package survey, delivery of the RAM to authorized laboratories is arranged through the RSS.

3220.4 Animals

The University permits the use of vertebrate animals in animal-related research, testing or training, but the purchase and use of animals is subject to approval and oversight under rules defined by the Yale Institutional Animal Care and Use Committee (IACUC) and the Director, Yale Animal Resources Center (YARC). These rules require that the YARC Procurement Office must process any order for vertebrate animals to be received on or off the Yale campus or used in University activities. All requisitions require a valid protocol number from IACUC. Requests for the purchase of animals may be made via telephone, fax, or by the completion of the [Form 3220 FR.03](#) Animal Requisition.

3220.5 Controlled Substances

Due to their potential for misuse and abuse, items listed by the US Department of Justice, Drug Enforcement Administration (DEA) and/or the Connecticut Department of Consumer Protection, Drug Control Division (DCD), as Schedule I to IV drugs are subject to special procurement, storage, use, and disposal requirements. These include federal and state licensing (prior to procurement), maintaining detailed storage and use records, and special disposal procedures.

Since the University cannot, by law, maintain a "blanket" registration for controlled substances, it is the responsibility of individual researchers and other staff using these materials to obtain appropriate registrations and licenses. OEHS facilitates the processing of State/Federal controlled substance licensing/registrations for individual Yale researchers.

Requests for purchases of controlled substances must be submitted to Procurement Department. All requests for State/Federal controlled substance licensing/registrations require completion of the following *Forms* and must be submitted to OEHS for approval

- [3220 FR.02](#) *State of CT - Application for Controlled Substance Laboratory License*,
- [3220 FR.04](#) *PTAEO Approval for State DCD Controlled Substance License* or
- [3220 FR.05](#) *PTAEO Approval for Federal DEA Registration*

3220.6 Non-Taxable Ethyl Alcohol

The University must maintain records, and report all purchases of, non-taxable, high-proof ethyl alcohol. Contract orders for non-taxable ethyl alcohol are managed by the Purchasing Department. The Department of Traffic, Receiving and Stores maintains a supply of this alcohol for research use at the University and keeps records of use and reorder. To request alcohol from this stock, University users and departmental stockrooms must complete a Stock Requisition form.

Special Situations/Exceptions

The policies governing the purchase of restricted materials are designed to meet regulatory compliance requirements and ensure the health and safety of the University community. Requests for exceptions, variances, or modifications to these policies should be directed, in writing, to the Purchasing Department and the Office of Environmental Health and Safety or the Yale Institutional Animal Care and Use Committee, as appropriate. Any appeals to the decisions should be brought to the attention of the University Safety Committee. Questions regarding interpretation of this policy should be directed to the Associate Director of Purchasing.

Related Information

Policy [3201](#) General Purchasing Policy

Guide [3220 GD.01](#) 3220GD.01 Restricted Items Requiring Pre-Order Approval

Form [3220 FR.01](#) Restricted Items Approval Request.

Form [3220 FR.02](#) State of CT - Application for Controlled Substance Laboratory License

Form [3220 FR.03](#) Animal Requisition [Yale Animal Resources Center website](#)

Form [3220 FR.04](#) PTAE0 Approval for State DCD Controlled Substance License

Form [3220 FR.05](#) PTAE0 Approval for Federal DEA Registration

[OEHS Policy](#) Use of Controlled Substances in Research Laboratories

[Federal DEA website](#) Drug Registration, Drug Enforcement Administration

Contacts

Subject	Contact	Phone	Fax
Interpretation of policy	Associate Director of Purchasing	432-9982	432-9966
Office of Environmental Health & Safety	Director of OEHS	785-3550	785-7588
Traffic Receiving and Stores	Manager	764-9308	764-9312
Yale Animal Resource Center	Business Administrator	785-2526	785-3099

Roles and Responsibilities

Office of Environmental Health and Safety

Establishes procurement and handling guidelines regarding hazardous and regulated materials, safety-critical equipment, radioactive materials, and controlled substances used at the University.

Department of Traffic, Receiving and Stores

Maintains stocks of non-taxable ethyl alcohol and records of their use at the University.

Requisitioner

Prepares and submits required documents and obtains approvals necessary for compliance.

Purchasing Department

Purchases restricted items on requisitions from authorized University personnel or departments in accordance with the guidelines and restrictions discussed in this policy. Establishes contract orders with vendors for the purchase of non-taxable ethyl alcohol.

Yale Animal Resources Center

Oversees the purchase, handling, husbandry, and health care of vertebrate animals used in research, testing, or training at the University.

Revision History

Policy first issued on 9/15/99. Previous Revision on 11/5/03.

The official version of this information will only be maintained in an on-line web format. Any and all printed copies of this material are dated as of the print date. Please make certain to review the material on-line prior to placing reliance on a dated printed version.