



**MONTGOMERY COLLEGE  
STANDARD OPERATING  
PROCEDURES**

Last Modified:

Last Reviewed:

Approved:

Subject Laboratory New Chemical Ordering and PHES Pre-Approval

**Subject: Laboratory New Chemical Ordering and PHES Pre-approval Process**

- **INTENDED AUDIENCE:** All laboratory managers, chemical inventory managers, faculty, and staff involved in chemical procurement.
- **AUTHORITY:** Montgomery College Public Health, Safety, and Emergency Management Policy 91000; Montgomery College Purchasing Card Program User’s Guide (Hazardous Materials Requirements).
- **PURPOSE:** To establish a standardized process for the review, approval, and procurement of new chemicals for laboratory use to ensure regulatory compliance, safe storage, hazard communication, inventory control, and prevention of exceeding applicable EPA, OSHA, or local emergency planning threshold quantities.

This SOP supports Montgomery College’s Purchasing Card Program hazardous materials requirements, which require PHES notification prior to purchasing hazardous materials if the chemical is new to the department.

**POLICY**

**Montgomery College Policy 91000 – Public Health, Safety, and Emergency Management**

Under Policy 91000, Montgomery College is committed to:

- Providing safe and healthful learning and working environments.
- Ensuring regulatory compliance with environmental, health, and safety laws.
- Managing hazards proactively through institutional oversight.
- Assigning PHES authority to review and coordinate health and safety risks.



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**Related Procurement Requirement**

Per the Montgomery College Purchasing Card Program User's Guide, Section 5.5 Hazardous Materials:

PHES must be notified before purchasing hazardous materials if the department has never kept an inventory or if the chemical is new to the department.

**Scope**

This procedure applies to:

- Academic laboratories
- Stockrooms
- Art studios using chemicals
- Facilities or technical departments purchasing laboratory-grade or hazardous chemicals.

Applies regardless of purchasing mechanism:

- P-Card
- Purchase requisition
- Grant funding
- Direct supplier order

**Responsibilities**

**Laboratory Manager / Chemical Inventory Manager**

In accordance with MC Safety Policy 91000, shared safety responsibilities:

- Review departmental inventory before requesting a purchase.
- Confirm the material is new to the department.
- Verify no suitable existing inventory is available.
- Submit the request to PHES before ordering.
- Maintain inventory and SDS records.
- Ensure the chemical is not purchased prior to PHES written approval.



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## **Public Health & Environmental Safety (PHES)**

Under Policy 91000, oversight authority:

- Review all new chemical requests.
- Evaluate environmental, occupational, fire, and storage risks.
- Assess regulatory thresholds.
- Approve, conditionally approve, or deny requests.
- Provide guidance on safe implementation.

### **Pre-Approval Procedure**

#### **Step 1 – Department Inventory Verification**

Prior to any purchase:

1. Review departmental inventory records
2. Verify the chemical is not already in stock
3. Determine if an approved substitute exists
4. Confirm the request is for a new chemical

#### **Step 2 – Submit Request to PHES**

Requests must be submitted by email by the Laboratory Manager or Chemical Inventory Manager.

#### **Subject Line:**

**New Chemical Approval Request – [Department / Building / Room]**

#### **Required Submission Information:**

- Requestor name/title
- Department
- Building/room
- Chemical name
- Manufacturer/vendor
- CAS number
- Quantity
- Concentration
- Intended use
- SDS attachment



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- Proposed storage location
- Funding source

Submit To: [EnvironmentalSafety@montgomerycollege.edu](mailto:EnvironmentalSafety@montgomerycollege.edu)

### PHES Review Standards

#### Regulatory Review:

- EPA hazardous substance thresholds
- EPCRA / Tier II thresholds
- OSHA Hazard Communication Standard
- NFPA / Fire Code storage limits
- Hazardous waste implications
- Controlled substance restrictions
- College policy compliance

#### Safety Review:

- Compatibility with existing chemicals
- Segregation/storage requirements
- Ventilation requirements
- PPE requirements
- Spill preparedness
- Waste disposal considerations
- Training obligations

### Approval Determinations

#### Approved

Written PHES approval issued; purchase may proceed.

#### Approved with Conditions

#### Examples:

- Quantity limitation
- Alternate storage controls
- Additional PPE
- Training completion



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- Secondary containment

**Denied**

Examples:

- Threshold exceedance
- Unsafe storage limitations
- Regulatory prohibition
- Institutional policy conflict
- Safer alternative available

**Post-Approval Requirements**

Upon receipt:

- Update chemical inventory immediately
- Maintain SDS access
- Label chemical properly
- Confirm storage compatibility
- Train affected users before use
- Update emergency planning documentation if applicable

**References**

- Montgomery College Public Health, Safety, and Emergency Management Policy 91000
- Montgomery College Purchasing Card Program User's Guide, Section 5.5 Hazardous Materials
- OSHA Hazard Communication Standard (29 CFR 1910.1200)
- EPA EPCRA / Tier II
- NFPA 45

**Enforcement Statement**

Failure to comply with this SOP may constitute a violation of Montgomery College Policy 91000 and related procurement controls, potentially resulting in suspension of purchasing privileges, corrective action, or other administrative review.