

Cornell University

Office of the Vice Provost  
for Research

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January 3, 2008

Re: Request for Assistance in Conducting Chemical Inventory  
Required by United States Department of Homeland Security

Dear Colleagues:

I am contacting you to request your leadership and the assistance of your unit in Cornell University's effort to comply with the Chemical Facility Anti-Terrorism Standards, which were issued on November 20, 2007 by the United States Department of Homeland Security (DHS) in order to protect against the theft and use of chemicals in terrorist activities. This regulation requires Cornell, along with all other research universities, to submit to DHS an inventory for the attached list of chemicals. The list contains those chemicals identified by DHS to have the potential for use in terrorist activities when present in quantities above certain thresholds. Cornell's Office of Environmental Health & Safety (EH&S) is coordinating the effort to complete this inventory between January 14 through February 28, 2008. Cornell is not eligible for an extension of the February 28 deadline.

The departments, centers, and institutes you chair and direct have been identified by EH&S as those most likely to contain the chemicals and quantities most relevant to the inventory. The conduct of the inventory requires the assistance of all faculty members, other researchers, facility managers, *etc.*, who are "chemical custodians", *i.e.* all individuals who exercise oversight over a space (*e.g.*, research group laboratory suite, research facility, teaching laboratory, room) in which chemicals are used and/or stored. Chemical custodians in facilities that already track chemical inventories using the Vertere database system, such as Baker Laboratory, Clark Hall, and S.T. Olin Hall, do not need to complete this inventory. If you are uncertain as to whether your unit utilizes the Vertere database system, please check with EH&S using the contact information provided at the end of this letter. EH&S requests that all other chemical custodians (or their designees) complete two tasks:

- (1) Identify which of the 171 chemicals on the attached list are presently found in the laboratories or other rooms under their oversight.

The attached list categorizes the chemicals according to physical state or use (*e.g.*, explosive or chemical warfare). As an additional resource, EH&S has provided an alphabetized list of these same 171 chemicals with their common chemical synonyms, if any, at the following website address: <http://www.ehs.cornell.edu/dhsinventory/default.htm>.

The following do not need to be inventoried: (a) mixtures; and (b) chemicals in quantities less than 10 gallons that are not in their original manufacturers' containers. Quantities of chemicals greater than 10 gallons must be reported, regardless of the container.

- (2) Enter the quantities of those chemicals by room into the web-based inventory application which will be available on January 14, 2008, at the same website provided above: <http://www.ehs.cornell.edu/dhsinventory/default.htm>.

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The application will capture the netID of the individual who enters the data and ask for the total quantity and units of measure for each chemical selected. This application is currently under construction and will be available on January 14, 2008.

Because the web-based application is not currently available, we are not requesting that you circulate this letter or news of the inventory requirement to your faculty and other researchers at this time. Instead, Michael Lonon of EH&S will forward this letter and an explanatory message to your Department Safety Representatives (DSRs). To the extent possible, the DSRs may choose to conduct certain room inventories before January 14 and to enter the data when the web-based application becomes available. The DSRs also will be instructed to assist your faculty members, other researchers and other chemical custodians in completing the inventories and entering the data into the web-based application after January 14.

Shortly before January 14, we will send you a letter for circulation to the faculty and other members of your departments, centers, and institutes. The letter will include the above inventory instructions. EH&S will send a reminder notice to the DSRs at this time, as well.

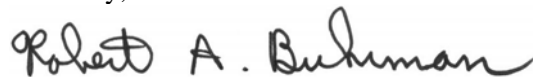
We are mindful of the short time frame and the unexpected impact that this Federal requirement presents to our faculty and staff, and we thank you in advance for your cooperation. EH&S already has applied available information to minimize the requirements of the inventory. For example, EH&S has applied the available regulatory limitations and exemptions to reduce DHS' list of 325 "chemicals of concern" to the 171 chemicals on the attached list.

We thank you again for your assistance with this process. Please note again that the inventory must be completed by February 28, 2008.

If you have questions or require further information, please contact EH&S:

|               |                               |
|---------------|-------------------------------|
| Michael Lonon | 255-6995 or ml107@cornell.edu |
| Tom McGiff    | 255-5835 or tjm3@cornell.edu  |

Sincerely,



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