All labs must maintain an up-to-date chemical inventory as required by Cal/OSHA Title 8 Section 5194 (e) (1) and to facilitate required Hazardous Material Reporting to UCLA’s Certified Unified Program Agency (CUPA). This document provides guidance for labs to help them determine what they need to include in their chemical inventory. These guidelines were developed based on the Los Angeles Fire Department’s CUPA reporting requirements.

What should be included in my inventory?

Only manufacturer supplied or other primary containers of chemicals should be included in your inventory. Mixtures and solutions made from chemicals in these primary containers, including hazardous waste, should not be included as this leads to double-counting and over reporting of quantities.

What is mandatory versus recommended?

While EH&S recommends that all chemicals be included in your lab’s inventory, certain chemicals with minimal hazards and/or stored in small quantities may be excluded. Here’s the breakdown:

The following MUST be included in your inventory:

- Any amount of a chemical with one or more of the following characteristics:
  - A Particularly Hazardous Substance (PHS: carcinogens, reproductive hazards, and acutely toxic chemicals).
  - A hazard characteristic of pyrophoric, water reactive, potentially explosive, peroxide forming, corrosive, oxidizing, and/or reducing. Consult the chemical's label and/or manufacturer provided Safety Data Sheet (SDS) to determine if any of these hazard characteristics apply.
  - A flammable solid (ignition < 212°F) or liquid (flashpoint < 100°F). Consult a manufacturer provided SDS to determine these values.
  - A compressed gas or cryogenic fluid such as liquid nitrogen.
- Other toxic (as defined in 2010 CA Fire Code) liquids in quantities (measured by container size) of 50 mL or more or solids in quantities of 50 g or more that do not have any of the characteristics listed above.
- Any liquid in a quantity of 100 mL or more excluding water.

The following may be excluded from your inventory:

- Water in any quantity.
- Liquids in quantities of less than 100 mL that are NOT PHS, toxic, flammable, pyrophoric, water reactive, potentially explosive, peroxide forming, corrosive, oxidizing, and/or reducing.
- Solids that are NOT PHS, toxic, flammable, pyrophoric, water reactive, potentially explosive, peroxide forming, corrosive, oxidizing, and/or reducing.
- Toxic liquids in quantities less than 50 mL or solids in quantities less than 50 g that are NOT PHS, flammable, pyrophoric, water reactive, potentially explosive, peroxide forming, corrosive, oxidizing, and/or reducing.

Additional Information

- Questions and comments: chemicalinventory@ehs.ucla.edu