United States Department of Agriculture Animal and Plant Health Inspection Service

# **WS** Directive

2.465 1/02/08

## ACCOUNTABILITY AND OVERSIGHT OF HAZARDOUS MATERIALS

#### 1. PURPOSE

To provide guidelines for maintaining accurate hazardous material inventories and records, and to established accountability and oversight by all field personnel, supervisors and managers.

## 2. REPLACEMENT HIGHLIGHTS

This directive revises WS Directive 2.465 dated 11/23/04.

## 3. POLICY

Accountability and oversight of hazardous materials (as defined in the Control Materials Inventory Tracking System (CMITS) Users Guide) is the responsibility of pesticide users as well as supervisors in WS Operations. To ensure that these activities are conducted in an orderly manner, several requirements are implemented.

All users of hazardous materials will conduct a quarterly physical inventory using the CMITS application within the Management Information System (MIS) to reconcile the perpetual inventory.

During the fiscal year, at least one annual physical inventory will be conducted by the hazardous material user and one reviewing official (i.e., District Supervisor, Assistant District Supervisor, collateral duty safety officer) designated by the State Director. In addition, State and District offices with a hazardous material inventory will conduct at least one annual physical inventory which will be verified by a second party other than the official responsible for this inventory. Annual inventories will be signed and dated by all associated individuals after conducting the inventory and submitted to the State Director for concurrence and use in compiling the annual State inventory.

All hazardous materials discrepancies will be resolved by the pesticide user and/or the reviewing official at the time of the physical inventory, if possible. This inventory will be reviewed by the immediate supervisor or designated official within 14 days of receipt of inventory record. All discrepancies will be corrected and accounted for in the MIS CMITS application within 30 days.

Other deficiencies not associated with the inventory (i.e. inadequate storage containers, equipment) that have been identified in the inspection or review process will be

addressed and resolved within 60 days. The appropriate supervisor will follow up prior to the next quarterly inventory to ensure these deficiencies have been addressed.

All hazardous material users will submit copies of their certified inventories to their appropriate District/State/Regional Office. State Offices will submit annual State inventories using the CMITS form entitled "Transaction Summary by Product" to their appropriate regional office. The State Transaction Summary by Product Report will be signed and dated by the State Director and Regional Director certifying that the inventory is correct and current. Copies of these signed annual State inventories will be mailed by the Regional Office to the Operational Support Staff (OSS) for further review and concurrence.

The State Director is ultimately responsible for ensuring that all discrepancies have been corrected. The Regional Director (or designated official) will further ensure that all inventories within the Region are accurate.

All State Program Evaluations will include conducting at least two physical inventories and storage site inspections of hazardous materials, one at a central storage/distribution facility (i.e. State or District Office) and the other at a field Wildlife Specialist's storage site. These inventories and inspections will be compared with those records in the state MIS based CMITS to ensure hazardous materials accountability and accuracy. The review team comprised of Regional, State, and Headquarters representatives will conduct the State Program Evaluations. Some of the subject matter that will be reviewed regarding hazardous materials is as follows: security, storage, warning signs, inventory, receipt of and transfer documentation, handling, disposal of any pesticides, I&E drugs and pyrotechnics, etc. Inventory discrepancies and results of the storage site inspections will be noted in the State Program Evaluation report, as appropriate.

The National Wildlife Research Center (NWRC) will continue to verify and account for pesticide usage in accordance with their Chemical Management Plan. Copies of NWRC certified annual inventories will be provided to OSS for analysis and concurrence.

#### 4. **REFERENCES**

WS Directive 2.401, Pesticide Use (1/02/08). WS Directive 4.210, Program Evaluation (3/1/04).

William Ht. Clay

Deputy Administrator