

2026 CHP Template Updates

CHP template and this document can be found here



<https://ehs.mit.edu/chemical-safety-program/chemical-hygiene/>

Summary of changes

- Add Hierarchy of Controls **New**
 - *Minor* update language for Particularly Hazardous Substances
 - *Minor* update language for Select Toxins
 - *Minor* update language for Waste Minimization
 - *Major* update language for Chemical Inventory
 - *Minor* update language for Prior Approvals
 - *Remove* Appendix 10.2 Department of Homeland Security chemicals **Delete**
 - *Re-number* Appendix 10.3 and 10.4 to 10.2 and 10.3
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P. 22 Part II

3.1. Preliminary Steps and Procedures

New Wording **New**

STEP 3: Determine required control measures by applying hierarchy of controls to minimize exposure.

Use the hierarchy of controls to identify possible control measures, and to provide a rationale for whether these measures have been implemented. The hierarchy of controls has five levels, ordered based on general effectiveness:

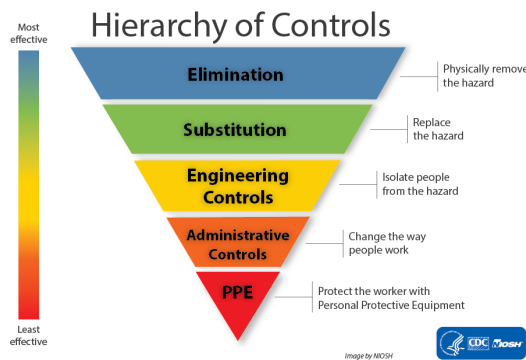
1. **Elimination** – Remove hazardous chemicals at the source. This could include changing the work process to stop using the hazardous chemicals. Elimination is the preferred solution to protect potentially exposed persons because no exposure can occur.
2. **Substitution** – Use a safer alternative to hazardous chemicals. When considering a substitute, compare the potential risks of the substitute to those of the original chemical. This review should consider how the substitute will combine with other agents in the workplace. Effective substitutes reduce the potential for harmful effects and do not create new risks.
3. **Engineering controls** – Engineering controls can include modifying equipment or the workspace, using local exhaust ventilation, protective barriers, and more to remove or prevent exposure to hazardous chemicals. Effective engineering controls:
 - ❑ Are part of the original equipment design
 - ❑ Remove or block hazardous chemicals at the source before it comes into contact with the worker;
 - ❑ Prevent users from modifying or interfering with the engineering control itself;
 - ❑ Need minimal user input; and
 - ❑ Operate correctly without interfering with the work process or making it more difficult.

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4. **Administrative controls** – Establish work practices that reduce the duration, frequency, or intensity of hazardous chemicals exposure. This may include work process training, ensuring adequate rest breaks, or limiting access to areas where hazardous chemicals exposure may be possible.
5. **Personal protective equipment (PPE)** – PPE is equipment worn to reduce or minimize exposure to hazards. PPE use should be accompanied by a PPE program, which includes such elements as PPE selection and use training, PPE inspection and replacement schedules, and effectiveness monitoring. Do not rely on PPE alone to control hazards when other effective control options are available.



A. Control Measures for Inhalation Exposure

Determine When to Use Laboratory Chemical Hoods (Fume Hoods)

XXX

Determine Whether Respirators Might Be Required

XXX

B. Control Measures for Absorption Exposure

Determine What Type of Personal Protective Equipment For Eyes and Skin

XXX

Old Wording

STEP 3: Determine required control measures, personal protective equipment, and proper work practices to minimize exposure.

A. Inhalation Control Measures

Determine When to Use Laboratory Chemical Hoods (Fume Hoods)

XXX

Determine Whether Respirators Might Be Required

XXX

B. Personal Protective Equipment For Eyes and Skin

XXX

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P. 35 Part II

3.3. Additional Requirements for Work with Particularly Hazardous Substances New Wording

3.3.9. Waste Disposal and Preventing Contamination.

The general waste disposal procedures outlined in Part II. Section 8. should be followed; however, certain additional precautions should be observed when waste materials are known to contain substances of high toxicity. Decontamination procedures should be developed for each PHS to ensure work surfaces and other potentially contaminated surfaces are clean after each use. These procedures will be specific to the chemical used and the way it is used. In cases where there is no specific way to deactivate a chemical, often times a commercial detergent spray such as Simple Green can be used. The contaminated debris should be collected as hazardous waste.

Old Wording

3.3.9. Don't contaminate the environment.

~~Vapors that are discharged from experiments involving particularly hazardous substances should be trapped or condensed to avoid adding substantial quantities of toxic vapor to the hood exhaust air.~~ The general waste disposal procedures outlined in Part II. Section 8. should be followed; however, certain additional precautions should be observed when waste materials are known to contain substances of high toxicity.

P. 36 Part II

3.4. Additional Requirements for Work with Select Toxins New Wording

Select Toxins are biologically derived toxic chemicals that are specifically regulated by the federal U.S. Department of Health and Human Services under regulation 42 CFR Part 73 when handled at levels above specified quantities. Select Toxins are particularly hazardous substances.

Old Wording

Select Toxins are biologically derived toxic chemicals that are specifically regulated by the federal U.S. Department of Health and Human Services under regulation 42 CFR Part 73 when handled at levels above specified quantities.

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8.3.3. Waste Minimization

New Wording

F. Make sure all samples and products to be disposed of are properly identified, labeled with its chemical name, and containerized. Do not leave them for others to clean up after you.

G. Chemicals that no longer serve a purpose to the lab or researchers are defined as inherently waste like and must be processed through the EHS Hazardous Waste Program'.

Old Wording

F. Make sure all samples and products to be disposed of are properly identified, labeled with its chemical name, and containerized. Do not leave them for others to clean up after you.

P. 60 Part IV

2.1. Chemical Inventory and Security

New Wording

It is a requirement of Massachusetts Fire Safety Code to comply with Maximum Allowable Quantities of hazardous chemicals in MIT buildings. The collection, aggregation, and reporting of accurate chemical inventory data is required for MIT to meet its regulatory requirements. To meet this requirement, the MIT Committee on Toxic Chemicals (CTC) has defined a lab-level requirement to maintain an inventory of hazardous chemicals. Please refer to the Chemical Inventory Guidance at <https://ehs.mit.edu/chemical-safety-program/chemical-inventory/>, which defines lab level requirements as to what chemicals should be inventoried, the minimum information that is required to be tracked and how often it should be updated. It also suggests additional information that is recommended to be tracked and who to contact for help.

Chemical inventories should be maintained on a regular, ongoing basis, but at a minimum they should be updated once per year during annual chemical reporting season (generally starting in October of each year) and then submitted to EHS. Chemical inventories must also be submitted to EHS in the following instances: at the request of an outside regulatory authority, when the inventory may be needed to determine compliance with fire codes, for example, during a construction or renovation project. There may be regulatory or other developments or changes that may require labs to submit their inventory to EHS throughout the year.

The EHS Office provides and supports a chemical inventory system, free of charge, for all labs to use for their chemical inventory. EHS Staff can assist your lab with getting started using the EHS-provided inventory platform by providing a demonstration,

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administering user access permissions, providing guidance materials, and uploading your initial well-formatted inventory. Please contact EHS at 617-452-3477 or email environment@mit.edu.

Prior to purchasing new chemicals, review your lab's current chemical inventory/search the shared inventory in the centralized system. When purchasing new chemicals, purchase minimum quantities necessary for your work. Less over-purchasing leads to less chemical waste.

Old Wording

1. The MIT Committee on Toxic Chemicals has instituted a requirement to maintain an inventory of hazardous chemicals. Hazardous chemicals include chemicals for which there is statistically significant evidence of health effects following exposure as well as flammable and explosive substances. Although inventories can be kept using any type of electronic or non-electronic method, the use of MIT's centrally provided chemical inventory platform which is supported by EHS is strongly recommended. For more information please visit <https://ehs.mit.edu/chemical-safety-program/chemical-inventory/> or by calling 2-3477. Your lab's inventory should be used to:

- Manage the chemical purchases to reduce or completely eliminate unnecessary purchases. Prior to purchasing new chemicals, review your lab's current chemical inventory/search the shared inventory in the centralized system. When purchasing new chemicals, purchase minimum quantities necessary for your work. Less over-purchasing will lead to less chemical waste.
- Provide a list of applicable chemicals to EHS when requested to meet regulatory reporting requirements, such as MIT's annual SARA Inventory Reporting requirement see Part IV section 9.

P. 61 Part IV

2.2. Department, Laboratory, or Center-Based Prior Approvals

New Wording

It is recommended that Departments, Laboratories, or Centers (DLCs) institute a program for requiring prior approvals before work with certain hazardous materials can commence. A suggested framework is provided in the *CHP Preparer's Guide*, located at <https://ehs.mit.edu/chemical-safety-program/chemical-hygiene/>. Details of the program should be included here. If no program is implemented, this Section 2.2 should be deleted.]

Old Wording

~~Researchers must obtain prior approval from the DLC EHS Coordinator and or the DLC EHS Committee before purchasing any of the 41 chemicals (see Part IV Appendix 10.2) with low threshold reporting quantities from the Department of Homeland Security~~

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~~(DHS) larger list of chemicals of interest (COI). EHS Coordinators will inform the EHS Office when a chemical from the list is purchased (though no prior approval from the central EHS office is required).~~

It is recommended that Departments, Laboratories, or Centers (DLCs) institute a program for requiring prior approvals before work with certain hazardous materials can commence. A suggested framework is provided in the *CHP Preparer's Guide*, located at <https://ehs.mit.edu/chemical-safety-program/chemical-hygiene/>. Details of the program should be included here. If no program is implemented, this Section 2.2 should be deleted.]

P. 77 Part IV

Appendix 10.2 **Delete**

New Wording

None. Appendix 10.2 has been deleted.

Old Wording

~~10.2 DHS List 41 Chemicals With Low Threshold Reporting Quantities That Require Prior Approval From The DLC EHS Coordinator or DLC EHS Committee Before Purchasing~~

Chemical of Interest	Synonym	Chemical Abstract Service (CAS) Number	Screening Threshold Quantity (lbs)

P. 77 and 78 Part IV Appendix

New Wording

10.2 Hazard Communication Safety Data Sheets – New Format

10.3 Hazard Communication Standard Pictogram

Old Wording

10.3 Hazard Communication Safety Data Sheets – New Format

10.4 Hazard Communication Standard Pictogram