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Abbreviations:

- AP Authorized Person
- CA-DOJ California Department of Justice
- CCSC Central Controlled Substances Custodian
- CS Controlled Substance
- CST Controlled Substances Tracking System
- DEA Drug Enforcement Administration, part of the U.S. Department of Justice
- EHS Environmental Health and Safety
- IACUC Institute Animal Care and Use Committee
- IPOC Institute Point of Contact, Director of Research Compliance
- LCSC Laboratory Controlled Substances Custodian
- OLAR Office of Laboratory Animal Resources
- ORC Office of Research Compliance
- PI Principal Investigator
- SOP Standard Operating Procedure (See section --- for a detailed list)
- UDTD Uniform Distribution, Transfer, and Disposal Form

INTRODUCTION

It is the policy of the California Institute of Technology (Caltech) to comply fully with all applicable laws and regulations concerning the registration, procurement, inventory, storage, record keeping, use and disposal of controlled substances. Caltech maintains two (2) DEA Controlled Substances licenses to support research, one in the Office of Laboratory Animal Resources and one on the Environmental Health and Safety Office. The licenses are renewed annually.

Members of the Caltech community requiring use of controlled substances for research must comply with all applicable laws and regulations. Principal investigators, staff, and students who require access to controlled substances for research must be trained to, be knowledgeable about, and be prepared to follow the procedures outlined in this document and provided in all Caltech Controlled Substances Standard Operating Procedures (CS-SOPs), before being authorized to work with controlled substances.

Failure to comply with these procedures and CS-SOPs may result in the loss of privileges to use controlled substances in research or in disciplinary action, up to and including, separation from Caltech. Penalties for violations of applicable laws and regulations may also result in the imposition of heavy fines, imprisonment of those responsible, and in the rescission of Caltech's registration and a loss of use for the Principal Investigator and/or all of Caltech.

CONTROLLED SUBSTANCES

Controlled substances, as used in this document, are those drugs and other substances included in Schedules II – V of the Controlled Substances Act, 21 U.S.C. sec. 801 et seq., and those

listed under California Health and Safety Code sections 11054 to 11058, including California Schedule III hormones as defined in section 11056. It is the responsibility of each Principal Investigator (PI), Caltech employee, and student who detects a theft, loss, or unexplained disappearance of controlled substances to immediately notify (1) the Central Controlled Substances Custodian and (2) the Institute Point of Contact (IPOC) of that theft, loss, or unexplained disappearance.

Reference websites linking to the appropriate controlled substance schedules have been appended to this document.

RESPONSIBILITIES

Division Chair

The Division Chair is responsible for approving all use of controlled substances by faculty and staff within the Division, and will indicate approval in the Controlled Substances Authorization Form (Attachment A). Approval will be either for animal use or other research.

Use of controlled substances in animal research must be approved in an Institute Animal Care and Use Committee (IACUC) approved protocol. If use of controlled substances is not within the scope of IACUC approval (i.e. use in non-vertebrate animals, cells, plants, or in vitro), a Divisional Approval Form (<u>Attachment A-1</u>) shall be completed and approved by the Division Chair and submitted with the Controlled Substances Authorization Form to the Central Controlled Substances Custodian (CCSC) for EHS.

The Division Chair is also responsible for ensuring that each PI authorized to use controlled substances maintains (1) a complete and accurate inventory of all controlled substances in their lab, and (2) a list of those individuals within their labs authorized to handle controlled substances.

Principal Investigator (PI)

PIs who require the use of controlled substances in their research shall submit a Controlled Substances Authorization Form (<u>Attachment A</u>) to the appropriate CCSC to establish a controlled substance program in their laboratory. Attachment A should be signed by the PI and approved and signed by the Division Chair prior to submission. PIs should contact the IPOC to determine which of Caltech's two licenses is appropriate. Each PI will:

- 1. Provide the name of each person in their lab who will be authorized to handle controlled substances (Authorized Personnel) to the CCSC. A list of such Authorized Personnel must be maintained in the laboratory and updates/changes conveyed to the CCSC in a timely manner, but not less than semi-annually.
- 2. Require Authorized Personnel to complete the Controlled Substances Authorized Personnel Registration Form (<u>Attachment B</u>). Each Authorized Personnel must pass a required background check.

- 3. Complete PI training provided by the IPOC.
- 4. Require all Authorized Personnel to complete controlled substances training. (CS-SOP 2, "Training Authorized Users of Controlled Substances")
- 5. Designate, by name, one person to be the Lab Controlled Substance Custodian (LCSC) who is authorized by the PI to request the purchase of controlled substances and who will receive controlled substances. If no LCSC is designated, the PI is responsible for purchase and receipt.
- 6. Ensure that Logbook(s) are maintained for all controlled substances used in the lab. Schedule II substances must be tracked in a single Logbook and Schedule III-V substances (<u>Attachment C</u>) can be tracked together in a single Logbook. All Logbooks must be kept in the laboratory as long as a lockbox is maintained in the lab, regardless of whether or not there are controlled substances are present in the lab.
- 7. Ensure that all controlled substances present in the laboratory have a corresponding UDTD form, which is readily accessible in the lab.
- 8. Ensure that periodic self-inspections are conducted no less than twice a year, completing the Controlled Substances Self-Inspection checklist form (Attachment E), even when there are no controlled substances in the lab. Current self-inspection documentation must be kept in the laboratory for the current and past 2 years, as long as a lockbox is maintained in the lab, regardless of whether or not controlled substances are present in the lockbox.
- 9. Ensure that all storage and security requirements are met. All lockbox locations and key storage must be approved by the CCSC.
- 10. Notify the CCSC and the IPOC immediately of any theft, loss, or unexplained disappearance of controlled substances. An investigation will be organized including the IPOC, the relevant CCSC, and, as necessary, an individual from Caltech Security.
- 11. Notify the CCSC and the IPOC as soon as practicable regarding a discrepancy in inventory, as this could possibly be evidence of a diversion. An investigation will be organized including the IPOC, the relevant CCSC, and, as necessary, an individual from Caltech Security.

Central Controlled Substances Custodian (CCSC)

Caltech's controlled substances program is managed by the Central Controlled Substances Custodian (CCSC). The CCSC is administratively responsible for overall coordination of these procedures and has the following responsibilities:

1. Follows CS-SOPs and participates in annual review and revision of the CS-SOPs with the IPOC.

- 2. Maintains the Controlled Substances Authorization Forms that have been approved by the respective Division Chair or IACUC (<u>Attachments A and A-1</u>).
- 3. Maintains a copy of completed Authorized Personnel Registrations (<u>Attachment</u> <u>B</u>).
- 4. Approves all storage locations.
- 5. Approves procurement and distribution of controlled substances used in research.
- 6. Is responsible for executing DEA 222 order forms and delivering controlled substances to the laboratories.
- 7. Performs and documents periodic compliance inspections, at least semi-annually.
- 8. Works with the Office of Research Compliance to coordinate biennial campuswide inventories with the laboratories.
- 9. Responsible for: the removal of unused or expired controlled substances from the laboratories; documentation, maintenance and storage of the waste-controlled substances inventory; arranging for and execution of removal of waste controlled substances inventory from Caltech.
- 10. Reports any theft, loss or unexplained disappearance of controlled substances of which the CCSC is aware to Caltech Security and the IPOC.
- 11. Maintains hard copies or readily retrievable electronic copies of initial inventory, biennial inventory, DEA 222 forms, DEA Forms 41, disposal inventory and certificates of destruction.
- 12. Maintains the electronic CS Tracking System, including changes/updates to the DEA or California controlled substances list.

Institute Point of Contact

The Director of Research Compliance is the formal Institute Point of Contact (IPOC) to the DEA. As such, the IPOC will be the primary interface with the DEA on all Institute matters in relation to the DEA, including:

- 1. Initiates and maintains the Caltech Licenses, and performs revisions of the licensure, as necessary.
- 2. Requests the DEA 222 forms on behalf of the Institute.
- 3. Completes and files the DEA 106 forms, "Report of Theft or Loss of Controlled Substances," in the event of a verified loss, theft, or diversion.
- 4. Serves as the institute point of contact in the event of a DEA inspection.
- 5. Reviews the CS-SOPs and this procedure on an annual basis and amends, as necessary.

Caltech Campus Security

Caltech Campus Security is responsible for assisting in the investigation of any suspected loss, theft, or unexplained disappearance of controlled substances.

Human Resources

Human Resources is responsible for providing security background checks and clearances to all Authorized Personnel who will be utilizing controlled substances in their research.

PROCEDURES

Registration and Purchase

Authority to utilize controlled substances in research and/or teaching activities shall be in accordance with Caltech's DEA licenses.

A record of all PIs authorized to use controlled substances in research shall be maintained by the Division, with a copy provided to and maintained by the CCSC. Division Offices must notify the CCSC if PI authorizations for in vitro uses of controlled substances are revoked. The CS Tracking System will flag purchases of controlled substances intended for use in vertebrate animals that do not have an IACUC approval. Such notification will prompt the CCSC to take action to immediately secure any inventory of controlled substances related to the revoked authorization.

Off-Campus Sites

If any research and/or teaching activities that require the use of controlled substances take place at a geographic site other than the Caltech campus in Pasadena, CA, a separate registration shall be obtained for that geographic site. The CCSC or the IPOC may be contacted for further information.

Requesting Controlled Substances

Prior to requesting the purchase of controlled substances and participation in this program, the PI must submit a Division approved Controlled Substances Authorization Form (Attachment A) to the CCSC which (1) describes the purpose of the research, (2) that the specific storage location and the key lockbox location for the controlled substances has been approved by the CCSC, and (3) that all individuals in the lab who will have access to controlled substances have submitted a Controlled Substances Authorized Personnel Registration Form. The CCSC will proceed to follow CS-SOP 1, "Commissioning a Lockbox."

Once the lab is fully commissioned and personnel are trained as participants in the controlled substances program, the PI or their designated Laboratory Controlled Substances

Custodian (LCSC) may submit purchase orders for controlled substances in Techmart, taking care to follow specific procedures.

Authorized Personnel

Each faculty member, staff member, and student who is authorized to use Controlled Substances must complete a Controlled Substances Authorized Personnel Registration Form (<u>Attachment B</u>) which must be signed by both the applicant (Authorized Person) and the PI. All Authorized Personnel must undergo a background check, be cleared by Human Resources, and trained by the CCSC and/or the IPOC (PIs) before ordering or beginning any work with controlled substances.

<u>Delivery</u>

All vendors must ship controlled substances to the CCSC, who will arrange receipt with the requesting LCSC. The CCSC will issue a Unified Distribution, Transfer, and Disposal (UDTD) Form (<u>Attachment D</u>) that will be associated with the container of the controlled substance via a Control Number.

Upon receipt of the controlled substance in the laboratory, the UDTD will be signed by the authorized LCSC and copy of the UDTD will be returned to the CCSC for recordkeeping. The UDTD shall accompany the controlled substance and its container for the life of the material, including through transfers and the final disposal of controlled substance. With each transfer of the controlled substance, the UDTD shall be updated.

Security & Storage

Each laboratory with controlled substances must maintain effective controls and procedures to guard against diversion. The lockbox and key storage and security must be approved by the CCSC. Effective controls must meet the following standards:

- 1. Controlled substances must be stored in a safe or in a securely locked, substantially constructed cabinet.
- 2. Access to controlled substances must be limited to the minimum number Authorized Personnel necessary.

Unless dilution is required, controlled substances shall not be transferred from the original container for storage purposes, nor shall the labels identifying the substances be removed. If dilution is required, the new container must be labeled with the name and control number for the controlled substance, the concentration, volume and the date of expiration.

Logbooks/Inspections/Recordkeeping

Each PI using controlled substances in research must ensure that the current Logbook(s) of all controlled substances are maintained in his or her lab. All Schedule II materials must

have their own Logbook, separate from Schedule III-V controlled substances. All Schedule III-V materials can be in the same Logbook.

The Logbook must conform to the Controlled Substances Inventory Logbook template (<u>Attachment C</u>). Logbooks shall be readily available and retrievable for audit by the Central Controlled Substance Custodian, Caltech Audit Services and Institute Compliance, and the DEA. All inventory records will be kept for the duration of the use of CS in the laboratory plus 2 years.

Any discrepancy shall be noted in the Logbook, initialed by the individual user and immediately reported to the Central Controlled Substance Custodian.

All self-inspection reports (<u>Attachment E</u>) performed on a semi-annual basis should be kept for at least two years from the date that the report was created. Self-inspection reports, when completed, should be kept in a readily accessible area inside the lab. (CS-SOP 6, "Semiannual Controlled Substances Inspections").

All records, including Logbooks and inventory records must be maintained in the laboratory, and be readily accessible, as long as the laboratory has a lockbox, even if the lockbox has no controlled substances in inventory.

<u>Inventories</u>

Each PI will ensure the complete and accurate inventory of controlled substances used in his or her lab.

Biennial Inventory

The DEA requires that a campus-wide biennial inventory be conducted for each license. All labs under that license must perform the inventory on the same day, and the individual lab inventories must be combined into a single license inventory. On the day designated in advance by the CCSC, the LCSC will provide a complete and accurate inventory of all the controlled substances on hand to the CCSC. All inventory records will be maintained, and be available for inspection, for at least 3 years from the date the record is created.

For each substance in a lab lockbox, the biennial inventory must contain the following information:

- Name of the Controlled Substance,
- CS Schedule (e.g. I-V),
- Caltech Control Number,
- Container Type (e.g. 5g bottle, 1ml bottle),
- Form (e.g. liquid, powder, tablet),
- Units of Measure (e.g. mg, mg/ml, 10 mg tablet),
- Weight/Volume in Container (e.g. 1mg, 2ml, 2tablets),

• Current Status (e.g. in lab, empty, etc.), indicate whether the Logbook entry is consistent, and any comments.

Controlled substances will not be transferred from the original containers for inventory purposes (i.e. to weigh contents or measure volume). Rather, visual comparison of the container contents with the Logbook entry is appropriate. Identifying labels shall not be removed from the original containers.

See CS SOP-8, "Biennial Inventory"

Transfers

When one lab wishes to transfer a container of controlled substances to another lab, the LCSC from the Transferring Lab will contact the CCSC to obtain authorization.

If approved, the LCSC from the Transferring Lab will complete the appropriate information on the UDTD associated with the container of controlled substances and both LCSCs will sign the form.

A copy of this form should then be sent to the CCSC for recordkeeping.

Disposal

The LCSC should contact the CCSC for disposal of controlled substances. The CCSC shall receive the substance for disposal and the LCSC will indicate in the appropriate laboratory Logbook that the controlled substance has been transferred to CCSC for disposal. Only the LCSC can release material to the CCSC for disposal.

Disposal should be arranged when:

- 1. The controlled substances container is empty, after all controlled substances have been used for the intended research work.
- 2. A project has been closed or terminated and any controlled substances are still in supply.
- 3. The PI determines that the controlled substances are no longer required.
- 4. The controlled substance has expired.

The original UDTD will be completed and the CCSC will remove the UDTD along with the controlled substance from the lab at the time of disposal pickup.

See:

CS-SOP 3, "Receipt of Controlled Substances for Disposal" CS-SOP 4, "Removal of Controlled Substances from Caltech"

Caltech

CALTECH PROCEDURE REGARDING CONTROLLED SUBSTANCES (INCLUDES PROCEDURES ON CHEMICAL PRECURSORS, CA 11107.1 CHEMICALS AND REGULATED LABORATORY ITEMS)

Decommissioning a Lockbox/Key Lockbox

The LCSC or PI should contact the CCSC to request decommissioning. At the time of decommissioning, the LCSC and CCSC shall perform an inventory, document all remaining controlled substances, and update all remaining UDTDs. The CCSC shall remove all remaining controlled substances in accordance with CS-SOP 5, "Decommissioning a Lockbox," and take custody of all lab documentation. The CCSC shall arrange for facilities personnel to remove the lockbox and key lockbox.



Attachments:

- A. Controlled Substances Authorization Form
 - A-1. Divisional Approval Form
- B. Controlled Substances Authorized Personnel Registration Form
- C. Controlled Substances Inventory Logbook
- D. <u>Unified Distribution</u>, <u>Transfer</u>, and <u>Disposal Form</u>
- E. Controlled Substances Self Inspection Form

References:

- A. DEA Schedules of Controlled Substances
- B. California Schedules of Controlled Substances (California HSC §11054 to 11058)
 - 1. HSC Section 11054
 - 2. HSC Section 11055
 - 3. <u>HSC Section 11056</u> (Includes Schedule III Hormones)
 - 4. <u>HSC Section 11057</u>
 - 5. HSC Section 11058

Caltech Controlled Substances Standard Operating Procedures (CS-SOP):

- 1. CS-SOP 1 COMMISSIONING A LOCKBOX
- 2. CS-SOP 2 TRAINING AUTHORIZED USERS OF CONTROLLED SUBSTANCES
- 3. CS-SOP 3 RECEIPT OF CONTROLLED SUBSTANCES FOR DISPOSAL
- 4. CS-SOP 4 REMOVAL OF <u>CONTROLLED SUBSTANCES FROM CALTECH</u>
- 5. CS-SOP 5 DECOMMISSIONING A LOCKBOX
- 6. CS-SOP 6 SEMIANNUAL CONTROLLED SUBSTANCES INSPECTIONS
- 7. CS-SOP 7 DEA 222 FORMS MANAGEMENT AND USE
- 8. CS-SOP 8 BIENNIAL INVENTORY
- 9. CS-SOP 9 DEA LICENSE RENEWAL AND ORDERING DEA 222 FORMS

CHEMICAL PRECURSORS, CA 11107.1 (a) CHEMICALS AND LABORATORY ITEMS

CALTECH PROCEDURE REGARDING CHEMICAL PRECURSORS & REGULATED LABORATORY ITEMS

INTRODUCTION

Chemical Precursors

Chemical precursors are chemicals used in the course of legitimate research that can potentially be used in the manufacture of controlled substances, such as methamphetamine, cocaine, heroin and MDMA (ecstasy). Chemical precursors, as used in this document, are those regulated by the State of California Department of Justice, Office of the Attorney General (CA-DOJ) and the Drug Enforcement Administration (DEA). The substances considered by CA-DOJ and DEA to be chemical precursors can be found at these weblinks: DEA Lists I and II and California precursor chemicals, respectively.

CA 11107.1 (a) Chemicals

<u>California Health and Safety Code 11107.1(a)</u> lists chemicals that can be used to facilitate the manufacture of controlled substances. Throughout this procedure, such chemicals are identified as "California Health and Safety Code 11107.1(a) chemicals."

Members of the Caltech community requiring use of chemical precursors and CA Health and Safety Code 11107.1 (a) Chemicals for research must comply with all applicable laws and regulations, as well as Caltech's policies and procedures. Principal Investigators, staff and students who use these chemicals for research must be knowledgeable about and follow all applicable procedures, before ordering or using them.

Failure to comply with these procedures may result in the loss of privileges to use these chemicals in research and/or discipline up to and including separation from the Institute. Violations of applicable law and regulations may result in penalties including but not limited to the imposition of fines and/or penalties.

RESPONSIBILITIES

Principal Investigators – Principal Investigators (PIs) who require the use of chemical precursors or 11107.1 (a) chemicals in their research are responsible for ensuring the proper procurement, storage, use, and disposal of these chemicals. PIs are also responsible for

ensuring that their lab personnel understand and comply with required procedures for purchasing, storage, use, and disposal of these chemicals.

Lab personnel – Lab personnel using chemical precursors or 11107.1 (a) chemicals in their research are responsible for properly storing, using, and disposing of these chemicals.

Environment, Health and Safety Office (EHS) – EHS coordinates with the Office of Research Compliance for reviewing and updating this program as needed. EHS provides training and technical assistance to Division Operations Officers, faculty and staff on implementation of this program, monitoring chemical precursors and 11107.1 (a) chemical purchases, as required, managing disposal of unused or expired chemical precursors consistent with the Caltech Chemical Hygiene Plan, and assisting Division Operations Officers, faculty and staff in identifying, evaluating and updating processes as needed.

Office of Research Compliance (ORC) – Maintains DEA license(s), coordinates with EHS regarding all aspects of this program, and, together with Caltech Security, is responsible for investigating any theft or loss of chemical precursors or 11107.1 (a) chemicals, as necessary.

Caltech Campus Security – Security, together with the Office of Research Compliance, is responsible for investigating any suspected theft or loss of chemical precursors or 11107.1 chemicals, as necessary.

PROCEDURES

Purchasing of Chemical Precursors and 11107.1 (a) Chemicals

Chemical precursors must be ordered from vendors within the state of California. A minimum 21-day processing period may be required for such purchases to be completed.

All chemical precursors ordered from campus, including the VWR stockroom, must be purchased through the Division of Chemistry and Chemical Engineering (CCE). Contact the EHS Central Controlled Substances Custodian at x 6727 or the CCE Purchasing Assistant at x6033 for more information.

All purchasers will be asked to complete a Caltech Report of Sale or Transfer of Controlled Chemical Substance within California Form (Attached). Please contact the EHS Central Controlled Substance Custodian at x 6727 if you receive a different Declaration Form, Management Approval Form, or another form entitled, "Report of Sale or Transfer of Controlled Substance within California" from a vendor. When you retrieve the chemical precursor, you will be asked to provide appropriate identification and sign a document.

All 11107.1(a) chemicals ordered from campus, including the VWR stockroom should be purchased through CCE or through TechMart.

Manufacturing of Controlled Substances

If any research or other use of chemical precursors or 11107.1 (a) chemicals, incidentally or by design, generates one or more <u>controlled substances</u>, please contact the Central Controlled Substances Custodian (CCSC) at x 6727 immediately. If controlled substances are generated, the <u>Controlled Substances Procedure</u>, above, must be followed.

Storage & Security

Storage of chemical precursors and 11107.1(a) chemicals must follow Caltech's chemical storage requirements for the hazard class of the chemical (e.g., flammable, toxic). Also, labs must provide effective controls and procedures to guard against theft or loss of chemical precursors.

Theft or Loss

Theft or loss of any chemical precursors or 11107.1 chemicals must be reported immediately to Caltech Security and/or the Office of Research Compliance.

Recordkeeping

The CCE Purchasing Assistant will keep copies of all Caltech Report of Sale or Transfer of Controlled Chemical Substance within California Forms for three years.

A report will be run, periodically, but not less than every two years, at the time of the EHS License Controlled Substances Biennial Inventory. A similar report will be generated by VWR, for purchases made in the VWR stockroom and merged into a final report. The final report will be kept on file and will include a list of 11107.1(a) chemicals purchased in the last three years by Caltech, as well as date of purchase, description and quantity of the item purchased, the name of the vendor, date of purchase, cost and invoice number.

Disposal

Contact EHS for disposal of any unused and/or expired chemical precursors or 11107.1 chemicals.

Sale of Laboratory Items

Caltech

CALTECH PROCEDURE REGARDING CONTROLLED SUBSTANCES (INCLUDES PROCEDURES ON CHEMICAL PRECURSORS, CA 11107.1 CHEMICALS AND REGULATED LABORATORY ITEMS)

As part of the CA-DOJ effort to prevent diversion of chemical precursors, there are specific requirements associated with the sale of any laboratory glassware or apparatus, any chemical reagent or solvent, or combination thereof, where the value of the goods sold (per sale) exceeds \$100. Therefore, no sales (or transfer) of these items may be made without notifying and seeking the assistance of your Division Operations Officer and the EHS Central Controlled Substance Custodian at x6727.

REPORT OF SALE OR TRANSFER OF CONTROLLED CHEMICAL SUBSTANCES WITHIN CALIFORNIA

California Health and Safety Code Section 11100(d) requires that any manufacturer, wholesaler, retailer or other person who sells, transfers, or otherwise furnishes a controlled chemical substance to a person in this state shall complete and submit this form to the California Department of Justice, Bureau of Narcotic Enforcement, Precursor Compliance Program, P.O. Box 161089, Sacramento, California 95816-1089. 21 days prior to the delivery of the substance.

It is a criminal offense to:

- Fail to report the transaction 21 days prior to the sale or transfer of the substance.
- Knowingly make a false statement in this report.
- Sell, transfer or otherwise furnish a controlled substance with the knowledge or the intent that the recipient
 will use it to unlawfully manufacture a controlled substance.

INSTRUCTIONS FOR COMPLETING THIS FORM

Part I of this report must be completed by the provider and received by the Department of Justice **21 days** prior to delivery of the controlled chemical substance. Part II of this report must be submitted when the precursor is received. It is to be typewritten or filled out legibly in ink and must be complete when submitted. **INCOMPLETE REPORTS DO NOT CONSTITUTE COMPLIANCE WITH THE LAW AND WILL BE RETURNED TO THE PROVIDER.**

PART I

Part I must be completed and received by the Department of Justice 21 days prior to delivery of the controlled chemical substance. Failure to comply with this law may result in prosecution.

Section A: Provider Information - The provider means the seller, transferer or furnisher of a controlled chemical substance.

Section B: Customer Information - "customer" means the authorized agent ordering the controlled chemical substance. "Proper identification" includes two or more of the following; federal tax identification number; seller's permit identification number; city or county business license number; license issued by the California Department of Health Services; registration number issued by the Federal Drug Enforcement Administration; precursor business permit number issued by the Bureau of Narcotic Enforcement of the California Department of Justice; motor vehicle operator's license; or other identification issued by a state. Indicate whether the purchaser is a first-time buyer, periodic buyer or regular customer.

Section C: Purchase Information - Complete all of the purchase information in this section. Indicate the controlled chemical substance and amount to be sold. Describe in detail the intended use of the substance.

PART II

Part II of this form must be submitted within 10 days following the date of proposed release indicated on Part I of this form to the California Department of Justice, Bureau of Narcotic Enforcement, Precursor Compliance Program, P.O. Box 161089, Sacramento, California 95816-1089.

Section D: This section must be completed at the time the substance is released.

Section E: This section must be signed by the provider and the customer. The "customer" is that individual who: takes delivery at the provider's facility; has the authority to accept the substance on behalf of the purchasing company or firm; has responsibility for stocking and maintaining the substance; or maintains the security and safety of the controlled chemical substance. It is incumbent on the provider to require proper identification prior to releasing the controlled chemical substance.

REPORT OF SALE OR TRANSFER OF CONTROLLED CHEMICAL SUBSTANCE WITHIN CALIFORNIA

<u>PART I</u> (To Be Completed at Time of Order)

A. PRO	OVIDER INFORMATION	:					
	y or Firm Providing the Chemic						
	Address:						
Telephon	ne Number:		Precursor Business Permit #:				
	STOMER INFORMATION						
	y or Firm Ordering the Chemica						
Name an	d Title:						
Identifica	ation Numbers:						
	Address:						
	y Address: (If different from de						
Business	Telephone Number:						
C INIX	OICE //	TE ODDEDE	D		TED DELEACE	DATE	
C. INV	OICE # DA	TE ORDERE	D	ESTIMA	TED RELEASE	DATE	
	First Time Decem	D:- J			Dl D		
	First-Time Buyer	Period	lic Buyer		Regular Buyer		
Volume	e/Amount	Volume/Amo	ount				
v Orann	<u> </u>	v orume/1 time	<u>Juni</u>				
1.	Phenyl-2-propanone	19.	_ Phenylpropano	lamine			
	Methylamine		Propionic anhy				
	Ethylamine	21.					
	D-lysergic acid	22.					
	Ergotamine tartrate	23	Piperonal				
	Diethyl malonate		_ Thionylchlorid	e			
	Malonic acid		_ Benzyl cyanide				
	Ethyl malonate	26	_ Ergonovine ma	ıleate			
	Barbituric acid	27	N-methylephedrine				
10	Piperidine	28	N-ethylephedrine				
11	N-acetylanthranilic acid	29	N-methylpseudophedrine				
12	Pyrrolidine		N-ethylpseudoephedrine				
13	Phenylacetic acid		Chloroephedrine				
14	Anthranilic acid		_ Chloropseudoe				
	Morpholine	33	Hydriodic acid				
	Ephedrine		_ Gamma-butyro	lactone			
	Pseudoephedrine		1,4-butanediol				
18	Norpseudoephedrine		_ Red Phosphoru	is, inc. White I	hosphorus		
		37	_ lodine				
Describe	in detail what each chemical b	eing purchased	is used for: (us	se additional sh	eet if neccessary)		
Manufac	turing (specify) <u>N/A</u>						
Resale	<u>N/A</u>						
	· · · · · · · · · · · · · · · · · · ·						
Kesearch	(specify)						

REPORT OF SALE OR TRANSFER OF CONTROLLED CHEMICAL SUBSTANCE WITHIN CALIFORNIA

<u>PART II</u> (To Be Completed at Time of Order)

A. PROVIDER INFORM	IATION:								
Company or Firm Providing the	he Chemical:								
Telephone Number:	elephone Number: Precursor Business Permit #:								
B. CUSTOMER INFOR	MATION:								
	e Chemical:								
Name and Title:									
Identification Numbers:									
Delivery Address:		City	State	Zip					
Company Address: (If different	nt from delivery address)								
Business Telephone Number:									
C. INVOICE #	DATE ORDERED	ESTIMA	TED RELEASE	DATE					
First-Time Buyer	Periodic Buy	er	Regular Buyer						
Attach conv of Invoice wi	th date of purchase, description o	fitems quantities nurch	ased and cost of ite	me nurchased					
reach copy of invoice wi	in date of parenase, description o	r items, quantities paren	ased and cost of ne	ms parenasea.					
D. RELEASE INFORM	ATION: (To Be Con	npleted At Time of R	elease)						
	`	•	,						
Date of Release:									
C . D' 1 II	D di.								
Customer Pick-Up	Drop-Snipme	entet is to be shipped, list na	ma of chinner)						
	(If the produc	it is to be simpped, fist ha	me of simpper)						
Form of Payment: Cash	Money Order	Cashier Check	Purc	hase Order					
E. CUSTOMER PICK-U	P IDENTIFICATION:								
Name:									
	any Ordering, if applicable:								
• •	3 6 11								
Vehicle License:									
	this report is true and correct and			case of a customer					
pick-up purchase, the custome	er's identification is consistent wit	th the information listed.							
CICNATUDE OF CHETOME	D.		DATE.						
SIGNATURE OF CUSTOME	ER:		DATE: _						
SIGNATURE OF SELLER:			DATE:						