

**ARS □ CSREES □ ERS □ NASS**

***Bulletin***

**Title:** Tracking Sales of Controlled Substances

**Number:** 08-246

**Date:** February 26, 2008

**Expiration:** February 27, 2009

**Originating Office:** Acquisition and Property Division, Acquisition Programs and Oversight Branch, AFM/ARS

**Distribution:** All REE Employees

This Bulletin is issued to inform REE employees of the requirement to track the sale of controlled substances.

Recently, the Drug Enforcement Administration (DEA) issued a final rule requiring executive agencies to track the sale of iodine and compounds containing iodine.

The DEA regards iodine and compounds containing iodine as reagents useful for the manufacture of methamphetamine.

In addition, the DEA has enacted several Acts to control chemicals that can be used in the production of controlled substances. DEA has classified these regulated chemicals as List I and List II and has the authority to modify the lists at any time. As defined in 21 CFR 802, a controlled substance is any drug or other substance, or immediate precursor, whose manufacture, possession, and use are regulated by the Government. For the purposes of this Bulletin, a controlled substance is any potentially dangerous substance under the regulation of the DEA. For your information and convenience, the regulated chemicals are found in Enclosures 1 and 2.

If you purchase or have purchased any chemicals from either List I or List II with a purchase card or purchase order, you will be contacted by the company you purchased the chemicals from to complete a letter of compliance. The intent is to identify individuals who are authorized by an agency to purchase these controlled chemicals. Currently, only customers who are known to purchase iodine or iodine-containing products are being contacted. Enclosure 3 is a sample compliance letter and form from Fisher Scientific.

Pursuant to Research, Education, and Economics (REE) policy, the purchase of controlled substances in List I and List II are restricted to warranted acquisition personnel. Non-procurement personnel are prohibited from using the purchase card or convenience check to buy controlled substances found in List I and List II. A requisition shall be prepared by the requester with a "certification statement" that the controlled substances are required in support of the research project and that they meet agency, departmental, and regulatory requirements, as applicable.

Acquisition personnel shall complete the compliance form and return it as instructed in the compliance letter. A copy of the compliance form and letter shall be included in the purchase card or purchase order file.

The REE Purchase Card Program Manual (213.3 M) has been revised to reflect this new policy.

LARRY R. CULLUMBER / s /  
Director  
Acquisition and Property Division

3 Enclosures

## List I Chemicals

(1) Anthranilic acid, its esters, and its salts
(2) Benzyl cyanide
(3) Ephedrine, its salts, optical isomers, and salts of optical isomers
(4) Ergonovine and its salts
(5) Ergotamine and its salts
(6) N-Acetylanthranilic acid, its esters, and its salts
(7) Norpseudoephedrine, its salts, optical isomers, and salts of optical isomers
(8) Phenylacetic acid, its esters, and its salts
(9) Phenylpropanolamine, its salts, optical isomers, and salts of optical isomers
(10) Piperidine and its salts
(11) Pseudoephedrine, its salts, optical isomers, and salts of optical isomers
(12) 3,4-Methylenedioxyphenyl-2-propanone
(13) Methylamine and its salts
(14) Ethylamine and its salts
(15) Propionic anhydride
(16) Isosafrole
(17) Safrole
(18) Piperonal
(19) N-Methylephedrine, its salts, optical isomers, and salts of optical isomers (N-Methylephedrine)
(20) N-Methylpseudoephedrine, its salts, optical isomers, and salts of optical isomers
(21) Hydriodic Acid
(22) Benzaldehyde
(23) Nitroethane
(24) Gamma-Butyrolactone (Other names include: GBL; Dihydro-2 (3H)-furanone; 1,2-Butanolide; 1,4-Butanolide; 4-Hydroxybutanoic acid lactone; gamma-hydroxybutyric acid lactone)
(25) Red Phosphorus
(26) White phosphorus (Other names: Yellow Phosphorus)
(27) Hypophosphorous acid and its salts (including ammonium hypophosphite, calcium hypophosphite, iron hypophosphite, potassium hypophosphite manganese hypophosphite magnesium hypophosphite and sodium hypophosphite)
(28) N-phenethyl-4-piperidone (NPP)
(29) Iodine

## List II Chemicals

(1) Acetic anhydride
(2) Acetone
(3) Benzyl chloride
(4) Ethyl ether
(5) Potassium permanganate
(6) 2-Butanone (or Methyl Ethyl Ketone or MEK)
(7) Toluene
(8) Hydrochloric acid (including anhydrous hydrogen chloride)
(9) Sulfuric acid
(10) Methyl Isobutyl Ketone (MIBK)
(11) Sodium Permanganate

## SAMPLE COMPLIANCE LETTER AND FORM

[Type Date]

[Type Name]  
[Type Address]  
[Type City, State Zip]  
[Account Number]

### **RE: DEA RECATEGORIZATION OF IODINE AND COMPOUNDS CONTAINING IODINE**

Dear Valued Customer:

As you may know, the Drug Enforcement Administration (DEA) issued a final rule on July 2, 2007, recategorizing iodine and products containing more than 2.2% iodine. The DEA regards iodine and compounds containing iodine as reagents useful for the clandestine manufacture of methamphetamine.

The DEA enacted the Domestic Chemical Diversion Control Act of 1993 and the Chemical Diversion and Trafficking Act of 1988 to control chemicals that can be used in the clandestine production of controlled substances. Listed chemicals, also known as precursor chemicals, are regulated by the DEA and controlled in order to prevent the illicit manufacture of controlled substances. DEA has classified these regulated chemicals as List I and List II (see enclosed lists) and has the authority to modify the lists at any time. The recategorization of iodine and products containing more than 2.2% iodine from List II to List I was effective August 1, 2007, and is described in Title 21 Code of Federal Regulations, Parts 1300-1399.

Our records indicate that you have purchased List I or List II products, such as iodine or iodine-containing products, from Fisher Scientific. As a condition to any future sale to you of such products, Fisher Scientific is obligated under Federal law (21 CFR 1310) to:

- Obtain and maintain, on an annual basis, a copy of your DEA registration for resale of List I chemicals
- Obtain and maintain, on an annual basis, a list of the names of the authorized buyers within your organization for any of these DEA-restricted chemicals, encapsulating machines, or tabulating machines;
- Keep records of all buyers of such products to verify the existence and validity of the business entity;
- Keep records of the purchase date, quantity and method of transfer; and
- Report to DEA suspicious purchases and/or unusual or excessive losses of listed chemicals.

In order to comply, please complete and return the enclosed form to Fisher Scientific before December 31, 2007. If you have any questions, please e-mail them to \_\_\_\_\_.

Sincerely,

[Type Date]

[Type Name]

[Type Address]

[Type City, State Zip]

**RE: DEA Letter of Compliance per 21 CFR 1310.07**

Dear Valued Customer:

Please complete and return this form by fax, mail or email before December 31, 2007, to Fisher Scientific.

Fax to: 412-490-8930, Attention: Regulatory Affairs (no cover letter necessary)

Print and mail to: Fisher Scientific, Regulatory Affairs, 2000 Park Lane,  
Pittsburgh, PA, 15275

Scan and email to: [regulatoryaffairs@thermofisher.com](mailto:regulatoryaffairs@thermofisher.com)

**COMPANY PROFILE**

***Name and Title of Person Authorized to Complete This Form:***

Name: (print or type)	
Signature:	Date:
Title:	
Email:	Phone:
Company Name:	
Account Number:	
Ship-to Street Address:	
City, State, Zip:	
Company Phone Number:	Fax Number:
Type of Business:	Account #:

***Please indicate below the name(s) of each individual authorized by your company to purchase these chemicals. You may add other authorized individuals on additional sheets.***

Name:	Name:
Signature:	Signature:
Email:	Email:
Phone:	Phone:

Please indicate which chemicals will be purchased (circle one or both):                      List I                      List II

Please indicate if you buy List I chemicals for resale:                                              Yes                      No

If yes, please provide your DEA Registration Number\*: \_\_\_\_\_

***\*Required for List I chemicals if purchased for resale and a COPY of your DEA registration certificate.***