



RICHARD O. BRAJER
Secretary

DANIEL STALEY
Director, Division of Public Health

DATE: July 8, 2016

POSITION STATEMENT: Storage of Hazardous Products in a Kitchen

PURSUANT TO: The Rules Governing the Sanitation of Child Care Centers, 15A NCAC 18A .2820 (b)

SOURCE: Beverly S. Baldinger, Environmental Health Regional Specialist, Children's Environmental Health Program, NCDHHS, EHS

QUESTION: Can you leave the hazardous products out in the kitchen if the kitchen is locked?

INTERPRETATION: No. Hazardous products in the kitchen must be stored in a locked storage room or cabinet.

DISCUSSION AND RATIONAL: 15A NCAC 18A .2820 (b)

All corrosive agents, pesticides, bleaches, detergents, cleaners, polishes, any substance which may be hazardous to child if digested, inhaled, or handled shall be kept in its original container or in another labeled container, used according to manufacturer's instructions and stored in a locked storage room or cabinet when not in use. Just because the kitchen is locked does not satisfy the requirements for this rule.

15A NCAC 18A .2808 (f) Children attending child care centers shall not be in the kitchen except when participating in a supervised activity. This is another reason hazardous products should be locked in a storage room or cabinet. Child care staff should not have to make sure hazardous products are inaccessible in the kitchen before taking children in the kitchen for activities. The Attorney General's office also has indicated that a locked kitchen is not deemed to be a locked storage room or cabinet.

REFERENCES: **15A NCAC 18A .2820 (b) and 15A NCAC 18A .2808 (f)**

NOTE: Position statements are policy documents to clarify how to interpret or enforce a law or rule. They are not enforceable on their own, but are intended to promote uniform interpretation and enforcement of the underlying law or rule.

