



North Carolina Department of Environment and Natural Resources
Division of Environmental Health

Beverly Eaves Perdue
Governor

Terry L. Pierce
Director

Dee Freeman
Secretary

November 23, 2010

MEMORANDUM

TO: Local Environmental Health Supervisors, Directors, and Coordinators

FROM: Kimly Blount, Field Supervisor
Children's Environmental Health Branch

THROUGH: Ed Norman, Program Manager
Children's Environmental Health Branch

SUBJECT: Administrative Rule 15A NCAC 18A .2820 and Hazardous Product Storage

This memo defines what is "out of reach" as it relates to products listed in administrative rule .2820 (Storage), which are not required to be in locked storage, but are required to be kept out of reach of children when not in use.

In reference to products listed in Administrative Rule 15A NCAC 18A .2820(b), (c) and (d) the term "kept out of reach" requires that these products be "inaccessible" to children, which is defined in .2820(b) as follows, "The product shall be considered inaccessible to children when stored on a shelf or in an unlocked cabinet that is mounted a minimum vertical distance of five feet above the finished floor." These products include non-aerosol disinfecting solutions, emergency medications and non-prescription diaper creams and sunscreens.

In reference to .2820(f) employee's purses are also required to be kept out of reach of children. However, since purses are not considered a product, they are allowed to be kept out of reach of children by other effective means so long as the purse does not contain medications or hazardous products, which would require it to be locked or stored out of reach as defined in .2820 (b).