



PRE-MANUFACTURING NOTIFICATION (PMN) POLICY

Scope

This policy addresses the standards for research exempt chemical substances under TSCA's PMN Protocol. Specifically it addresses the proper method of distributing chemical substances offsite. Of primary concern are those substances distributed by the Biology and Chemistry departments.

Purpose

The purpose of this policy is to provide for the proper completion and distribution of the Research Exempt Substances Notification (RESN). It is also intended that the RESN accurately and completely convey environmental and health hazards associated with the substances being distributed. Finally, the policy is intended to provide for the proper container labeling of the substance being distributed.

Process

1. Exemptions from the PMN are only valid if chemical substances are not sold or used for commercial purposes. Additionally, the chemical substances being distributed offsite can only be used for analysis, experimentation or testing.
2. A faculty member shall supervise and review for completeness and accuracy sections #1, #2, & #3 of the RESN.
3. The faculty member shall sign the RESN when the form is complete.
4. The chemical substance shall be packaged in accordance with DOT regulations.
5. A signed copy of the RESN shall be included in the package with the sample.
6. In addition to the address label placed on the package, a "**FOR R&D USE ONLY**" and a "**TSCA SHIPPING LABEL**" shall be affixed to the package as well.
7. A signed copy of the RESN form shall be sent to the Mgr, EPA Audit for auditing and recordkeeping purposes.
8. RESN's will be maintained for a minimum of 5 years

Responsibilities

1. Faculty Members
 - a. Properly complete and sign an RESN for all chemical substances distributed offsite.
 - b. Properly package and label chemical distributed offsite.
 - c. Provide the Mgr, EPA Audit with a copy of all RESN(s).
2. Mgr, EPA Audit
 - a. Audit all RESN(s) received and provide feedback when necessary.
 - b. Maintain records of all RESN(s).

Evaluation

The Environmental Committee shall be responsible for evaluating this policy annually.

Document History

Created: 8/2007