

TSCA Management Guidelines

Management System Elements	Management System Activities
Assessing	<ul style="list-style-type: none"> • Identify and evaluate conditions that have regulatory implications and understand the scope of applicable regulatory requirements. (40 CFR 700-790) • Evaluate lab operations to determine applicability of TSCA requirements. Activities subject to TSCA requirements include: importation and exportation of chemicals, commercial development of products, shipments or chemicals to facilities (e.g. other Universities, research centers) within U.S., allegation of new significant adverse reactions to chemical exposure, and discovery of substantial risk for a chemical substance. • Determine if lab operation includes “commercial” research activities. If so, contact EHS for assistance. <i>Commercial research activities include research conducted for commercial/private purposes. An example would be if a company provided funding for research intended to be used for immediate commercial gain in the marketplace.</i> • Identify personnel whose job function or activity may involve TSCA regulated activities.
Planning	<ul style="list-style-type: none"> • Develop procedures and systems for managing compliance (e.g., plans, procedures, and policies). • Establish an internal system to ensure TSCA-regulated activities are conducted in compliance. This should include: <ol style="list-style-type: none"> 1) Designation of a person(s) to act a primary TSCA coordinator 2) Establish a TSCA-related records file to store TSCA applicability determinations, import certification, export notification, records of intra-facility shipments, health & safety records and other related records.
Implementing	<ul style="list-style-type: none"> • Ensure that a system is in-place (i.e. personnel responsibilities) to manage or implement compliance (e.g., TSCA import certification export notification, intra-facility shipments, health and safety records/reports, etc.). • Ensure that appropriate personnel have review TSCA Implementation and Compliance Guide on the EHS website.
Reviewing	<ul style="list-style-type: none"> • Develop a process for periodically reviewing and monitoring compliance programs (e.g., self- inspections, audits, etc). • A review of each lab’s TSCA program should be conducted annually using the TSCA Self- Assessment Checklist. • TSCA Applicability must be assessed at least annually to determine the elements of TSCA that may apply to lab operation.
Organization	<ul style="list-style-type: none"> • Establish clear roles and responsibilities to manage compliance with applicable regulations. • Procedures or job descriptions should be in-place or modified to clarify roles and responsibilities for TSCA compliance.