



**Santa Clara
University**

Chemical Donation Policy

**Santa Clara University (SCU)
500 El Camino Real
Santa Clara, CA 95053**

June 2010

Policy Review Record

| Revision Number: 0 | | |
|--------------------|---|--|
| Name | Title | Department |
| Jeff Charles | Director | Facilities |
| Molly McDonald | Assistant Vice President | Department of Human Resources |
| Sam Florio | University Risk Manager | Risk Management and CPSJ Insurance Group |
| Esther Pham | Director, Research Compliance and Integrity | Office of Research Initiatives |

Policy Approval

| | |
|---|----------------|
| <i>Signature on file in the EHS office</i> | <i>1/31/11</i> |
| Signature | Date |
| Joe Sugg Assistant Vice President University Operations, University Operations | |

Chemical Donation Policy

1. Purpose

Upon occasion, businesses, schools, or other organizations offer to donate chemicals (e.g., paints, lab chemicals) to SCU. These donations can reduce the cost of obtaining chemicals and provide an opportunity for waste minimization for the donor. However, accepting donated chemicals can result in chemical management compliance and potential safety issues for SCU. Moreover, the chemicals may have to be disposed of as hazardous waste at significant cost and SCU assumes the potential liability associated with disposal. The purpose of this policy is to ensure that chemical donations are accepted only if they have a beneficial use for SCU and do not create significant safety and liability concerns.

2. Applicability

This policy applies to donations of chemicals offered to SCU, Departments, or individual faculty or staff members.

3. Policy

To ensure that SCU has the proper storage and safety processes in place to accept chemical donations, each chemical donation request must be submitted to the EHS Director for review. The EHS Director will consult with the Risk Manager and others as appropriate before approving the donation request.

SCU will not accept chemical donations that meet any of the following criteria:

- Opened containers;
- Original labels not intact;
- Expired or within six months of expiration date; or
- On the DEA Chemicals of Concern List, California Department of Justice, Precursor Chemicals, Department of Homeland Security, Chemicals of Interest, require TSCA import certification or chemicals that are in highly hazardous classes such as explosive, reactive, highly toxic, radioactive and peroxide forming.

Attachment 1 is the form that should be completed and emailed to the EHS Director for review and approval. Chemical donations will not be accepted until the EHS Director has approved the donation.

Attachment 1

SCU Chemical Donation Request Form

Instructions: complete the following information and email to the EHS Director. Do not accept donation until EHS Director's approval is received.

SCU Recipient's name:
Recipient's Department:
Recipient's phone number:

Donor's name:
Donor Organization:
Contact phone number:

Reason the organization is donating the chemical:

Who from SCU will inspect the chemicals prior to acceptance:

When and how the chemical(s) will be transported to SCU:

Proposed use of the chemical(s) and timeframe for use:

Proposed use location:

Proposed storage location:

Description of waste generated as the result of the chemical use:

Complete Chemical Donation List (page 2) and submit with this form.

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| EHS Director Response (approve/deny) | |
| Conditions on approval | |
| Comments (if denied, provide reason) | |

