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| <b>Title:</b>                                     | Hazardous Materials Recall Policy |
| <b>Approved by:</b>                               | Environmental health and Safety   |
| <b>Effective Date:</b>                            | 4/19/2019                         |
| <b>Responsible Official:</b>                      | Environmental Health and Safety   |
| <b>Responsible University Office:</b>             | Environmental Health and Safety   |
| <b>Revision History:</b>                          | None                              |
| <b>Related Legislation and University Policy:</b> | EPA, DOT, OSHA, FDA               |
| <b>Review Period:</b>                             | 5 years                           |
| <b>Last Review Date:</b>                          | 4/19/2019                         |
| <b>Relates to:</b>                                | All of CWRU Community             |

#### **Summary of This Policy:**

The recall and use of a material is expressly determined by the manufacturer. If the material is determined to be defective, the community must be alerted. This policy covers the acceptable methods for return and disposal of these materials. The use of defective materials or expired materials in research is expressly forbidden.

#### **Purpose of This Policy:**

Establishing the methods and means to handle materials determined to be defective, that might poses a risk to the community, as well as the acceptable use and disposition of these materials is vital to the operations of research and the safety of the community. How this information is handled and communicated to the community determines the effectiveness of this policy.

#### **Definitions:**

**Acceptable Use:** Means the ethical use of a material in research and published literature.

**Disposal:** The means and methods for the final disposition of a material through proper Federal, State, and Local regulatory in which the material is rendered harmless to the community and environment.

**Return:** Means the return of a material to the original supplier of the material for exchange or refund.

## **Procedures:**

### **Communication:**

When a recall is received from a manufacturer, the recall may not be directly reported to EHS and is usually communicated to the purchaser of the material. It is imperative that when a recall is received that it is communicated to immediately to EHS. Many recalled materials are recalled for safety reasons and removing these materials from circulation quickly is important.

Upon reception of a notice of recall, the EHS department will

- Notify General Consul of the occurrence

- Determine users and contact them directly if possible by use of inventory and purchasing records.

- Notify the Research Office and place a notice in their newsletter

- Place an article in the CWRU Daily if the recall warrants a large distribution

- If a material possess a material threat to security or safety, EHS may elect to go directly to user locations and remove materials to safe storage until their disposition is determined.

### **Disposition:**

Material may either be returned to the manufacturer or disposed. This will depend on the nature of the recall and the policy of the manufacturer.

If it is determined that a Chemical/Biological/Radiological product is to be returned, the EHS office will work with the laboratory to arrange for proper DOT shipping as required.

If a Chemical/Biological/Radiological material is to be disposed of, the EHS office will arrange for the disposal of the material through the CWRU Hazardous Waste programs.

EHS will not ship materials that are not hazardous as defined by DOT/IATA/EPA/NRC

### **Acceptable Use:**

Use of recalled materials in the performance of research is expressly forbidden. Use of materials that may not meet specification or otherwise possess a defect jeopardizes the validity of the results obtained by their use. Recalled materials may not be used for research.

Sale of or transfer of a recalled material to another research group, organization including high schools, or university or charity is expressly forbidden.