

INDIANA UNIVERSITY-PURDUE UNIVERSITY AT INDIANAPOLIS

LABORATORY SAFETY POLICY

<u>Subject</u> : Mercury Reduction/Elimination	<u>Approved</u> : Laboratory Safety Committee
<u>Effective Date</u> : June 23, 2006	<u>Policy</u> : 3

PURPOSE AND BACKGROUND:

Mercury is recognized by national public health experts as one of the most significant environmental toxicants facing the United States. The public health effects of mercury in the environment are well researched and documented. The United States Environmental Protection Agency and the Indiana Department of Environmental Management have identified the elimination of mercury sources and the proper disposal of mercury as priority public outreach projects for each agency.

Further illustration of this concern occurred in 1998 when the American Hospital Association entered into a memorandum of understanding with the United States Environmental Protection Agency requesting that all member institutions commit to the elimination of all sources of mercury from their facilities within a 5-year period. Due to difficulty in meeting the 5-year deadline, the AHA withdrew its signature from the memorandum of understanding but extended its commitment to the concept of eliminating mercury sources within a reasonable time period.

Mercury is the most commonly spilled chemical product on campus. A significant expenditure of resources is expended each year by University personnel in the remediation of these spills. Improper disposal and/or unrecognized or unreported releases of mercury pose a significant threat to the community and can lead to significant regulatory consequences for the University. In many, if not most cases, effective (from both a performance and cost perspective) alternatives for mercury have been developed and are readily available.

Indiana University – Purdue University Indianapolis, as a generator of hazardous chemical waste, has an obligation under federal and state regulation to reduce the volume and toxicity, including mercury, of these wastes generated to the fullest extent economically practicable.

The Administration of IUPUI recognizes the threat presented by mercury and is committed to reducing this threat to the lowest level practical in as timely fashion as possible.

SCOPE:

By the adoption of this policy, Administration shares this commitment with all staff, faculty, students and guests of the University community.

POLICY:

All nonessential uses of elemental mercury or mercury-based compounds are to be eliminated from campus laboratories by December 31, 2007. Mercury and mercury-based compounds being eliminated from chemical inventories are to be referred to the IUPUI Department of Environmental Health and Safety for proper disposal by means of the *IUPUI Hazardous Materials Manifest for Intracampus Transportation* available at the following link: http://www.ehs.iupui.edu/ehs/environment_manifestForm.asp.

Following December 31, 2007, costs associated with the disposal of mercury wastes will be referred back to the generating department. In addition, all cost associated with the response and remediation of a mercury release will be referred back to the department.

An essential use of mercury is defined as that given circumstance where no acceptable alternative for the current use can be located or where it is found that implementation of the alternative would create a significant, long term financial hardship to the department or research project.

Effective December 31, 2007, no mercury-containing device, elemental mercury or mercury-based chemicals may be acquired without the expressed written consent of the Laboratory Safety Committee.

Laboratories wishing to maintain inventories of mercury products after December 31, 2007 shall contact the IUPUI Environmental Manager at 274-4351 and request an exception to this policy. The Department of Environmental Health and Safety (EHS) will take the request under consideration, will review all appropriate documentation and will render an opinion in writing as to whether the request, in the opinion of the Department, is of merit.

In the event of disagreement, EHS will offer an opinion in writing the next regularly-scheduled Laboratory Safety Committee meeting for consideration by the Committee at large. The laboratory in question will be given an opportunity to present a case in favor of the continued use of the material or item. By means of a vote of a simple majority of those members present at that meeting, a final decision as to whether the proposed use is considered as essential will be rendered.

For those uses found to be essential, the mercury is to be eliminated from the laboratory's inventory once an ongoing need can no longer be demonstrated.

EHS and the Committee will work in a cooperative fashion with any department found to have an unusually large inventory of mercury-based materials or items to allow for the phase-in of alternatives without creating a financial hardship for the department.

In the event a significant need is evident, EHS will explore grant opportunities to help offset the costs of acquiring acceptable alternatives.

NONCOMPLIANCE/PENALTIES:

The Department of Environmental Health and Safety may, at its discretion, refer costs incurred from the disposal of wastes generated by actions contrary to the principles of this policy back to the producing or generating department.

Staff, faculty, students and guests of the University whose willful actions violate existing federal and state regulation may be held criminally and civilly liable for their actions.

In the event the University is cited and fined by federal, state or local regulatory agencies for actions or activities contrary to applicable regulations, the department(s) involved in the citation may be accountable for payment of the issued fine.

In addition, the University may initiate disciplinary actions, up to and including dismissal, against any staff or faculty found to be in violation of this policy.

PROGRAM OVERSIGHT AND EMPLOYEE ASSISTANCE:

The Department of Environmental Health and Safety will serve as a technical resource for the implementation of this program. The Department will also serve to oversee the development and implementation of mercury educational materials as needed.