

Environmental Compliance

PS-EHS-06



About This Policy

Effective Date:

06-30-2016

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06-30-2016

Responsible University Office:

University Environmental Health and Safety

Responsible University Administrator:

Office of the Executive Vice President for University Academic Affairs

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Related Information

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This policy applies to all employees of Indiana University.

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Indiana University is committed to 1) supporting sustainability and minimizing the impact of its operations on the environment and 2) complying with all applicable regulatory environmental, health, and safety requirements. In order to

ensure that a minimal level of protection is maintained, all operations must satisfy all federal, state, and local regulations as well as any guidance developed by Indiana University organizational units designated with the authority to do so.

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Reason For Policy

This policy and associated procedures set Indiana University's expectations in the area of environmental compliance, toward the goal of protecting the environment, ensuring effective operations, and satisfying federal, state, and local regulations, such as regulations from Occupational Safety and Health Administration, Environmental Protection Agency, National Institutes of Health, Nuclear Regulatory Commission, Indiana Department of Environmental Management, and other federal, state and local agencies. Indiana University's **Principles of Ethical Conduct** specifically mention a culture of compliance with laws, regulations and policies; ethically conducting teaching and research; and promoting health and safety in the workplace.

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Procedure

General

1. Each department is responsible for ensuring compliance with these procedures by the individuals working within the unit.
2. Supervisors are responsible for ensuring that all individuals working in the unit have been adequately trained. Training must be completed before individuals begin performing duties that require training as per applicable regulations.
3. Proper labeling and storage of all hazardous materials is required and essential for a safe work environment.
4. Individuals who participate in an activity that results in a waste product of any kind must follow the disposal procedures identified in the Waste Management Guide and do so in compliance with all regulations. Individuals must prevent the release of contaminants through sound best management practices for waste generation, handling, and disposal.
5. Safety Data Sheets (SDS) for all chemicals are required to be maintained in the workplace or on-line. Safety Data Sheets are available from manufacturer's web sites and through the MSDSOnline® service at the IUEHS website.
6. The prompt reporting of hazardous material spills to proper University authorities is an essential element in the protection of the health and safety of faculty, staff, students, visitors, and patients. Follow the spill procedures for chemical, biological, or radiological spill as necessary.

Requirements for Specific Types of Work

Indiana University faculty and staff perform many different tasks in different settings. Although the general requirements referenced above apply to all work, the following briefly describe specific types of work and any related guidelines, manuals, plans, and programs are enforceable by this policy. Compliance with other applicable federal, state, and local regulations may also be required.

Clean Air Act

Indiana University operations on all campuses are subject to the requirements of the Clean Air Act. The Clean Air Act governs all air emissions from all sources, including, but not limited to: boilers, generators, water heaters, and process heaters. Please consult your campus IUEHS office well before installing any of these devices, as the approval and permit process may take several months, depending on the device, its intended use, and the campus.

Hazardous Materials, Spill Prevention, and Hazardous Waste Management

There are many types of hazardous materials utilized in university units and also a variety of hazardous wastes are generated. The safe, environmentally sound management of these materials is essential for compliance with local, state and federal standards/regulations. The programs below meet or exceed these standards/regulations by preventing the release of contaminants through sound, best management practices for waste generation, hazardous material handling, and disposal.

Prompt reporting of all spills of hazardous materials is essential to ensure that the spills are cleaned up in a safe and timely manner, and also to ensure that any necessary reporting and recordkeeping obligations are fulfilled. The following programs, reflecting laws and regulations, must be adhered to, as appropriate to the particular situation:

Community Right-to-Know
Hazardous Materials Transportation
Mercury Reduction/Elimination Program
Spill Prevention, Control, and Countermeasure Plan
Spill Response
Spill Reporting Requirements and Response Program
Underground Storage Tanks
Waste Management Program
Waste Minimization and Pollution Prevention Program

Water Protection

1. Indiana University operations on all campuses are subject to the requirements of the Clean Water Act and Safe Drinking Water Act. The Clean Water Act governs all emissions to all bodies of water, including groundwater. Such discharges may not be performed without appropriate permitting and oversight from the State of Indiana.
2. All Indiana University campuses operate under stormwater permits issued by the State of Indiana, either as standalone permittees or as co-permittees with other entities. These permits impose significant educational and operational responsibilities on the University.
3. Note that under the Safe Drinking Water Act, in areas designated as Wellhead Protection Areas, special rules may apply.
4. Please consult your campus IUEHS office well before any such discharges occur, as the approval and permit process may take an appreciable amount of time.
5. The following programs, reflecting laws and regulations, must be adhered to, as appropriate to the particular situation:
Wellfield Protection Program
Stormwater Protection Program

University Environmental Health and Safety (IUEHS) is responsible for:

- Developing, implementing, and maintaining all university programs concerning environmental compliance;
- Performing periodic inspections to confirm compliance;
- Providing and documenting generally applicable training for university employees concerning the requirements of this policy and their responsibilities;
- Maintaining current knowledge concerning the requirements for environmental compliance, in addition to the safest methods for responding to spills and other environmental emergencies;
- Serving as a technical resource for the implementation of waste minimization activities; and
- Acting as the point of contact between Indiana University and the governmental entities charged with enforcing the regulatory requirements represented in this policy, including providing oversight for all reporting requirements.

Departments are responsible for:

- Properly training all departmental staff members and assuring compliance in the their roles in implementing the requirements of this policy;
- Promptly reporting any spill of hazardous materials to the campus IUEHS office (as described in the **Spill Reporting and Response Program**), even if the spill is contained and cleaned up by departmental personnel;
- Collecting information and communicating to IUEHS as required by this policy and the programs incorporated herein;
- Ensuring that all wastes that cannot be reused or recycled are discarded in compliance with the provisions of the current edition of the **Waste Management Guide**;
- Evaluating waste minimization and pollution prevention opportunities in their work area on a regular basis and implementing those opportunities as described in the **Waste Minimization and Pollution Prevention Program**; and

- Requesting an exception to the **Mercury Reduction/Elimination requirements**, by contacting IUEHS for your respective campus, for any mercury-containing device or compound deemed by the department to be essential to the mission or operation of the department.

Individuals are responsible for:

- Complying with all environmental and other requirements for the work being performed; and
- Promptly reporting any **spill of hazardous materials** to the campus IUEHS office.

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Definitions

EPA - Environmental Protection Agency.

Hazardous Material – any substance that presents a potential hazard to the user from a biological, chemical, radiological, or other perspective.

IDEM – Indiana Department of Environmental Management.

IUEHS - University Environmental Health and Safety.

SOP- Standard Operating Procedure.

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Sanctions

Failure to follow the requirements of this policy may subject employees to progressive disciplinary action, up to and including dismissal, in accordance with University policies. IUEHS has the authority to immediately halt non-compliant activities.

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Additional Contacts

<i>Contact</i>	<i>Phone</i>	<i>Email</i>
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History

This policy was established in 2016.