



Mercury Reduction/Elimination

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POLICY # IN-FIAD.SUS.02

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Effective: November 3, 2009

Last Updated: November 16, 2012

Responsible IUPUI Campus Division:

Finance and Administration

Responsible IUPUI Campus Office:

Office of Sustainability

Responsible IUPUI Campus Administrator:

Colleen McCormick, Director, Office of Sustainability

Policy Contact:

Colleen McCormick

The IUPUI administration formally approves official campus administrative policies through an established process, publishes those policies in a consistent format, and maintains official campus policies in a central, readily accessible policy website. Responsible administrators (as defined below) and their offices, that are engaged in developing and maintaining campus-wide administrative policies must comply with the procedures in this policy for drafting, approving, revising, distributing, maintaining, and withdrawing campus-wide policies. Academic policies are available on the [Faculty Council website](#).

This policy is in accordance with University Policy [UA-08, Establishing University Polices](#).

Scope

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

Policy Statement

All nonessential uses of elemental mercury or mercury-based compounds are to be eliminated from the campus locations outside a laboratory setting by **XXXXX xx, 2013 (6 months following formal adoption of policy by campus administration)**. (The IUPUI Laboratory Safety Committee policy on mercury reduction/elimination remains in full effect as passed on June 23, 2006 and as implemented on campus to date). All waste containing mercury is to be given controlled disposal unless otherwise authorized by the IUPUI Office of Environmental Health and Safety (EHS). Mercury, mercury-based compounds and mercury-containing devices and

products being eliminated are to be referred to EHS for proper disposal by means of the *IUPUI Hazardous Materials Manifest for Intracampus Transportation* available at the following link: <http://ehs.iupui.edu/waste-manifest.asp>.

Following XXXXX xx, 2013 (6 months following formal adoption of policy by campus administration), costs associated with the disposal of mercury wastes from sources determined not to be essential may be referred back to the generating department. (Regardless of whether a use is determined to be essential, disposal costs for mercury wastes generated as a result of campus renovation projects will be considered as a project cost similar to other environmentally hazardous materials). In addition, all cost associated with the response and remediation of a mercury release may also be referred back.

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.

Effective XXXXX xx, 2013 (6 months following formal adoption of policy by campus administration), no mercury-containing device, elemental mercury or mercury-based chemicals may be acquired without the expressed written consent of the IUPUI Sustainability Subcommittee on Land, Air and Water.

Campus personnel or departments wishing to maintain inventories of mercury products after XXXXX xx, 2013 (6 months following formal adoption of policy by campus administration) shall contact the IUPUI Environmental Manager at 274-4351 and request an exception to this policy. The Office 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 EHS, is of merit.

In the event of disagreement, EHS will offer an opinion in writing the next regularly-scheduled IUPUI Sustainability Subcommittee on Land, Air and Water meeting for consideration by the Committee at large. The individual or department requesting the exception 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 inventory once an ongoing need can no longer be demonstrated.

EHS and the Subcommittee 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.

Reason for Policy

Mercury is recognized by national public health experts as one of the most significant

environmental pollutants 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.

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 cases, effective alternatives for mercury (from both a performance and cost perspective) have been developed and are readily available.

Indiana University – Purdue University Indianapolis (IUPUI), 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.

Exceptions

Not provided - will be updated during review process.

Procedures

For Disposal of Elemental Mercury, Mercury Compounds or Devices Containing Mercury:

1. Elemental mercury, mercury-bearing compounds or devices containing mercury are to be referred to the IUPUI Office of Environmental Health and Safety for proper disposal by means of the EHS on-line chemical waste pick-up request form available at: <http://ehs.iupui.edu/waste-manifest.asp>

To Request an Exception to this Policy:

1. Campus departments or personnel wishing to maintain inventories of elemental mercury, mercury compounds or mercury-containing devices are to contact the current campus Environmental Manager at 4-4351 to request an exception to this policy.
2. The requester of the exception is to provide justification for the request including documentation that the need constitutes an essential use and that an acceptable alternative does not exist or that implementation of the alternative would create a significant, long-term financial hardship for the office or department requesting the exception.
3. The Office of Environmental will take the request under consideration, research all pertinent facts associated with the request and offer an opinion in writing as to whether the request is, in the opinion of EHS, constitutes an essential use.
4. In the event of disagreement between EHS and the requester, the requester will be afforded an opportunity to present a case in favor of the exception to the IUPUI Sustainability Subcommittee on Land, Air and Water (Subcommittee) at the next regularly scheduled meeting of the Subcommittee. EHS will also be afforded the opportunity to present a case at the meeting.
5. By means of a simple majority vote of Subcommittee members present, a final decision

- will be rendered as to whether the proposed use is to be considered essential.
6. In the event the Subcommittee determines that the need is not an essential use of mercury, the requester will refer the mercury to EHS for proper disposal as described previously in this policy.
 7. In the event the Subcommittee determines the use to be essential, the mercury is to be eliminated from inventory once an ongoing need can no longer be demonstrated.

Definitions

1. Mercury: A chemical element commonly known as quicksilver. Elemental mercury is a silvery metal which is liquid at room temperature. Mercury and compounds of mercury are typically very toxic and should be handled with the utmost of care. When released into the environment, mercury can combine into a variety of chemicals of varying toxicity. Mercury and mercury compounds can bioaccumulate and biomagnify in the environment. Mercury is commonly found in electrical switches, thermostats, fluorescent lamps and in a variety of scientific and medical devices including sphygmomanometers, thermometers, manometers, barometers and other analytical equipment.
2. Essential Use of Mercury: A given circumstance where no acceptable alternative for the current use of mercury can be located or where it is found that implementation of the alternative creates a significant, long-term financial hardship for the department or research project.

Sanctions

Following **XXXXX xx, 2013 (6 months following formal adoption of policy by campus administration)**, the Office of Environmental Health and Safety may refer back to the producing or generating department costs incurred as the result of the disposal of mercury-bearing wastes from sources not determined previously to be essential. In addition, EHS may refer back time, materials and appropriate disposals costs incurred in the response to and mitigation of any mercury release from such sources.

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.

Additional Contact Information

<i>Subject</i>	<i>Contact</i>	<i>Phone</i>	<i>Email</i>
Environmental Health and Safety	Kevin Mouser	274-4351	kmouser@iupui.edu
Environmental Health and Safety	Amanda Stinnett	278-3328	asfoti@iupui.edu

Forms

Waste Chemical Pick-Up Request Form: <http://ehs.iupui.edu/waste-manifest.asp>

Web Addresses

<http://ehs.iupui.edu/chem-lab-safety.asp?content=laboratory-policies-mercury-reduction-elimination>

Related Information

Not provided - will be updated during review process.

Document Change Log

Include information about previous policy versions or whether this policy replaces an existing policy.

<i>Date</i>	<i>Contact</i>	<i>Email</i>	<i>Status</i>
11/2009	Kevin Mouser	kmouser@iupui.edu	Adopted
11/2012	Kevin Mouser	kmouser@iupui.edu	Revised
2/2014	Kati Reeves	kreeves7@iupui.edu	Converted to policy template

Communications

Specify population to receive communications and desired communication methods.

	✓ the desired populations & communication methods
Students	
Staff	
Faculty	
Jag News	
Faculty Council	

Staff Council	
IUPUI Facebook	
IUPUI Twitter	
Housing	