

Mercury Reduction/Elimination Program

November 13, 2015

1. INTRODUCTION

1.1 Purpose

Indiana University Environmental Health and Safety (IUEHS) has developed this Program to reduce the volume of mercury within the University system to the lowest possible level while providing Indiana University employees with a mechanism for allowing for the continued use of mercury deemed to be essential.

1.2 Scope

This program applies to all Indiana University properties and to all Indiana University faculty and staff.

2. AUTHORITY AND RESPONSIBILITY

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

- Developing, implementing, and maintaining the Mercury Reduction/Elimination Program;
- Serving as a technical resource for the implementation of this Program;
- Providing proper disposal for all mercury wastes produced;
- Receiving and processing requests for exceptions to the Mercury Reduction/Elimination Program;
- Maintaining records of all exceptions granted to the Mercury Reduction/Elimination Program.
- Inspecting Indiana University laboratories for nonessential uses of mercury during annual audits.

2.3 Departments are responsible for:

- Reviewing chemical inventories for their areas of responsibility and ensuring that all nonessential sources of mercury are referred to IUEHS for proper disposal according to the provisions of the [Indiana University Waste Management Program](#).
- Requesting an exception to the Mercury Reduction/Elimination Program, 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.

3. Program Elements

- 3.1 All nonessential uses of elemental mercury or mercury-based compounds are to be eliminated from all University locations, including laboratories, by December 31, 2016. The provisions of existing Mercury Reduction/Elimination Policies on the Bloomington and Indianapolis campuses remain in full effect and will transition into this Program upon its adoption and full implementation.
- 3.2 Mercury-based compounds being eliminated from chemical inventories are to be referred to IUEHS for proper disposal by means of the [Indiana University Waste Management Program](#) and the [Waste Management Guide](#) for the respective campus.
- 3.3 Effective December 31, 2016, no mercury-containing device, elemental mercury or mercury-based chemical may be acquired without the expressed written consent of the IUEHS Office for the respective campus.

3.4 Exemptions

Locations, including laboratories, wishing to maintain inventories of mercury products after December 31, 2016 shall contact IUEHS for the respective campus to request an exception to this Program. For those uses found to be essential, the mercury is to be eliminated from the location's inventory once an ongoing need can no longer be demonstrated.

The following blanket exemptions are recognized by this Program:

- Bureau of Standards Accredited Mercury Thermometers for laboratories falling under College of American Pathologists (CAP) standards – only as required by CAP
- Dental mercury amalgams – Dental School and other approved clinic or research locations
- Existing mercury thermostats and switches (existing units are to be replaced upon renovation of the space or replacement of the equipment)
- High intensity microscope mercury lamps
- Regular and low mercury fluorescent lamps
- Thimerosal when used as a preservative
- Ultraviolet lamps.

3.5 Noncompliance/Penalties

Following December 31, 2016, all costs associated with the disposal of nonessential uses of mercury wastes will be referred back to the generating department. In addition, any costs associated with the response and remediation of a mercury spill or release will be referred back to the department.

Noncompliance issues in a laboratory setting will be handled according to corrective action provisions of the [Indiana University Laboratory Safety and Chemical Hygiene Plan](#).

4. RECORDKEEPING

- 4.1 IUEHS for the respective campus will maintain records of Program exemptions requested and granted in response to this Program.

5. REVISIONS

New Document – November 13, 2015

APPENDIX A – DEFINITIONS

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 and can bioaccumulate and biomagnify.

Mercury is commonly found in electrical switches, thermostats, fluorescent lamps, in chemical compounds and in a variety of scientific and medical devices including sphygmomanometers, thermometers, manometers, barometers and other analytical equipment.

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.