



UNIVERSITY POLICY

SUBJECT:	HEALTH AND SAFETY	TITLE:	ENVIRONMENTAL POLLUTION PREVENTION		
CATEGORY: Check One	Board of Trustees <input type="checkbox"/>	Presidential <input checked="" type="checkbox"/>	Functional <input type="checkbox"/>	School/Unit <input type="checkbox"/>	
Responsible Executive:	Vice President for Internal Audit and Public Safety		Responsible Office:	Emergency Management and Occupational Health and Safety	
CODING:	00-01-45-05:00	ADOPTED:	08/01/91	AMENDED:	08/30/12
				LAST REVIEWED: 08/30/12	

I. PURPOSE

The purpose of this policy is to help protect life, health, and property, as well as the surrounding communities and local environments by conducting environmental management safely and responsibly. The policy also promotes compliance with federal, state, and local laws and regulations, as well as accepted standards and guidelines for controlling environmental pollution. UMDNJ takes a proactive approach through comprehensive environmental programs, and compliance with air and water pollution control laws and regulations is the primary focus of this policy. This policy gives specific UMDNJ departments and personnel the tools to identify, investigate, and correct potential violations.

II. ACCOUNTABILITY

Under the direction of the President, the Vice President for Internal Audit and Public Safety shall ensure compliance with this policy. The Executive Director of Emergency Management and Occupational Health and Safety (EMOHS), in collaboration with the Director of Environmental and Occupational Health and Safety Services (EOHSS), shall implement this policy and provide guidance and technical assistance to all UMDNJ Departments in complying with the University’s environmental programs.

III. APPLICABILITY

This policy covers underground and aboveground storage tanks; air quality and protection; water protection; pesticide use and storage; and, wetlands preservation and conservation. This policy applies to all UMDNJ owned and occupied facilities where its operations may affect environmental quality.

IV. REFERENCES

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| A. | Indoor Air Quality and Extreme Ambient Conditions | 00-01-45-05:05
(under development) |
| B. | Regulated Medical Waste | 00-01-45-15:00 |
| C. | NJ Worker and Community Right to Know Act | 00-01-45-25:00 |
| D. | Hazardous Waste Management | 00-01-45-35:00 |
| E. | University Transportation – Motor Vehicle Fleet | 00-01-55-60:00 |
| F. | Waste Source Reduction and Recycling | 00-01-55-75:00 |

- G. Clean Air Act (CAA) 42 U.S.C. §7401 et seq.
- H. Clean Water Act (CWA) 33 U.S.C. §1251 et seq.
- I. The Federal Insecticide, Fungicide, & Rodenticide Act (FIFRA) 7 U.S.C. §136 et seq.

VI. POLICY

A. Requirements:

1. Underground (UST) and Above-ground Storage Tanks (AST)

Physical Plant shall ensure that proper management of oil and biodiesel storage tanks meet current standards for leak detection, spill/overflow protection, and secondary containment. Physical Plant shall maintain the necessary New Jersey Department of Environmental Protection (NJDEP) registration(s) and a written spill prevention plan that is updated as necessary and reviewed at least annually. EOHSS shall review the plan and provide technical assistance to renew the UST/AST registration(s) as required by the NJDEP.

Physical Plant (University-wide) is required to monitor all throughputs in the fueling systems. The departments shall retain and maintain all related records (including fuel logs, inspections, and registration forms) and shall forward copies to EOHSS annually, or upon request.

2. Air Quality and Protection

Potential sources of indoor and outdoor air pollution include chemicals emanating from building systems and motor vehicles; chemical, radiological, and biological contaminants from research and clinical labs; and other materials. Indoor Air Quality issues are investigated in-house in a joint effort by EOHSS and Physical Plant (refer to University policy, Indoor Air Quality and Extreme Temperature Conditions, 00-01-45-05:05). Ambient air discharges from stationary emission sources (e.g., boilers, turbines, emergency generators) are maintained and controlled in accordance with permit requirements, by Physical Plant. Logistical Services maintains, repairs, and disposes of University-owned motor vehicles. Physical Plant and Logistical Services are responsible for record keeping and forwarding documentation to EOHSS, as required. EOHSS shall review all State of New Jersey Air Permits issued to UMDNJ by NJDEP and provide technical assistance to apply for new permits or renew existing permits, as required.

To enhance the working environment for all faculty, staff, students, patients, and visitors, as well as to protect the surrounding community, the University will take reasonable steps to ensure that the potential for indoor and outdoor air pollution is minimized. The following actions represent the minimal steps to achieve this objective:

- a. All generators and boilers on the University's campuses shall be monitored as required by the University's Operating Permit, and records shall be logged by Physical Plant staff as stipulated in the permit to ensure State limits are not exceeded.
- b. Pollution control equipment shall be maintained to proper operating levels to ensure that any discharges into the air do not exceed State standards.
- c. To decrease the amount of emissions discharged into the air, the University shall seek alternative methods, such as upgrading combustion equipment and changing fuel consumption, as appropriate.

- d. A regular program of preventive maintenance shall be used to maximize the performance of the heat, ventilation, and air conditioning (HVAC) systems.
- e. Lab hoods and safety cabinets, where chemical, radioactive, or biological materials are used, shall have properly maintained filtration systems, such as activated charcoal and high efficiency particulate air (HEPA) filters.
- f. All new construction and renovations shall address the quality of air entering and exhausting the facility. This will be accomplished through:
 - i. The appropriate placement of air intakes and exhausts, and providing adequate amounts of supply and exhaust air.
 - ii. The use of contractors licensed by the State Department of Labor for asbestos and lead abatement projects.
 - iii. The use of licensed air conditioner and refrigerator repair technicians.
 - iv. The requirement that contractors/vendors supply all information for completing inspection permits and certifications.

3. Water Protection and Conservation Management

Water pollution, in the form of process and laboratory wastewater, sewerage, biological contaminants, and low-level radioactive wastes may derive from many sources. Physical Plant shall maintain waste treatment system permits, with guidance by EOHSS. Physical Plant shall ensure that discharge limits are not exceeded, in accordance with state and local standards. Sampling shall be conducted by a State-licensed laboratory and reports shall be compiled pursuant to permit requirements.

To ensure that the University actively protects, conserves, and manages water resources, the following protocol shall be followed:

- a. Wastewater from laboratories and the Newark Power Plant shall have a pH between 5.5 and 9.5 and no other hazardous constituents prior to release into the sanitary sewer system.
- b. Detergents with little or no phosphate shall be utilized for dishwashing. Corrosive toilet bowl cleaners shall be replaced with appropriate alternatives.
- c. All liquid products containing hazardous ingredients, such as automotive products, cleaning products, paints, refrigerants, and similar items, shall be handled with care and properly disposed (refer to the University policy, Hazardous Waste Management, 00-01-45-35:00) or shall be replaced by other non-toxic substitutes.
- d. Low flow water regulators, toilets, and other water saving equipment shall be utilized in University facilities, wherever possible.
- e. All water line repairs shall be scheduled as soon as they are reported. Major water leaks shall be repaired immediately after they are reported; minor water leaks will be addressed as soon as practicable.
- f. Low-level radioactive materials discharged into the sanitary sewer shall be monitored to ensure that levels set by the Nuclear Regulatory Commission (USNRC) and New Jersey Department of Environmental Protection (NJDEP) are not exceeded.

4. Pesticide Application

Physical Plant shall oversee licensed contractors for pesticide application on all campuses. Contracted vendors are required to use fertilizers, insecticides, and pesticides according to the manufacturer's instructions. The University requires contracted vendors to substitute hazardous products with environmentally friendly ones, whenever practical and reasonable, when maintaining the University's grounds. The University policy, NJ Worker and Community Right to Know Act, 00-01-45-25:00 requires all vendors to submit for review the Material Safety Data Sheets (MSDS) for all hazardous chemicals brought onto University property.

5. Wetlands

Wetlands (marshy areas) are integral to the health and well-being of environmentally sensitive areas. The University adheres to federal Clean Water Act protocols in this matter. Special consideration will be given if a campus construction project includes an activity that would disturb a wetlands area. Facilities Planning, Management, and Construction (FPMC) shall secure any necessary permits, such as those issued by the U.S. Army Corps of Engineers, in the event that a project requires one.

B. Responsibilities:

1. EOHSS is responsible for:

- a. Providing technical and regulatory assistance as needed;
- b. Assisting with the permitting and permit renewal process; and
- c. Conducting environmental compliance audits of the programs in this policy.

2. FPMC is responsible for:

- a. Administering wetlands regulatory and permitting compliance.
- b. Ensuring the acquisition of permits for new equipment, as required, and provides copies of permits to building owners and tenants.
- c. Managing contractors performing large asbestos and lead abatements throughout the University.
- d. Acting as liaison between the Department of Community Affairs and the University in matters of Plan Review, Construction Permits, and Certificates of Approval or Occupancy. (End Users must notify FPMC of new major equipment, assist with applications for Plan Review and Permits, and bear the costs for Plan Review and Permits.)

3. Physical Plant is responsible for:

- a. Administering fuel oil and gasoline storage tank management on all UST systems;
- b. Ensuring that air and water protection measures are properly employed;
- c. Overseeing pesticide use;
- d. Managing contractors performing small asbestos and lead abatements.

4. The Office of Radiation Safety Services is responsible for administering the radiation safety program, including a low-level radioactive waste management program on the Newark and Stratford campuses. On the Piscataway and New Brunswick campuses, the Rutgers Environmental Health and Safety (REHS) department performs this function under contract with UMDNJ. These offices have a specific role in air and water quality protection related to compliance with the USNRC and NJDEP regulations; also, the Radiation Safety Officer (RSO) for each campus ensures that proper labeling requirements are followed at the designated radioactive work areas.
5. Deans, Vice Presidents, and President/CEOs of Healthcare Units shall ensure compliance with this policy to the extent applicable to the departments/schools/units under their authority.
6. Faculty, Principal Investigators, staff, students, and volunteers are responsible for:
 - a. Adhering to the requirements of this policy, establishing and sustaining a workplace where these ideals can be expressed.
 - b. Use and care of properly equipped local exhaust systems (e.g., biological safety cabinets) to minimize indoor air pollution and air emissions.
7. Any occurrence causing damages to third parties or potentially resulting in financial loss to the University must be reported to the Risk Management department so that UMDNJ may comply with the terms and provisions of insurance policies applicable to pollution and environmental loss.

C. Enforcement:

1. Compliance with the provisions and the guidelines set forth in this policy by all faculty, staff, students, and volunteers is mandatory. Violations of relevant laws, regulations, standards, and implemented guidelines may result in fines or citations against the University. Disciplinary action, up to and including termination/dismissal, may be taken and/or an unfavorable performance appraisal may be issued by the applicable Dean, Vice President, or President/CEO of a Healthcare Unit (or designee) against individuals or groups of individuals determined to have violated this policy.
2. Noncompliance with applicable laws, regulations, standards, and implemented guidelines, and/or this policy will result in EOHSS issuing a "Notice to Comply," requiring corrective actions on the part of the individual, group, department, and/or school/unit. Certain violations may be the subject of reporting to appropriate UMDNJ administrative officials (e.g., Chief Executives, Ethics & Compliance, Legal Management, etc.) in order that any appropriate action, disciplinary or otherwise, might be considered.
3. Fines and sanctions levied by outside agencies (such as NJ DEP, EPA, etc.) for violations are the responsibility of the department whose employee's, volunteer's, and/or student's actions incurred the violation. If determined appropriate by Legal Management, the University may seek restitution for fines and other sanctions from individuals who are egregiously or criminally at fault for causing such violations.

By Direction of the President:

SIGNATURE ON FILE

Vice President for Internal Audit and Public Safety