



UNIVERSITY OF VIRGINIA
Office of the Vice President and Provost

Peter W. Low

*Vice President and Provost of the University
Hardy Cross Dillard Professor of Law*

November 23, 1999

MEMORANDUM

TO: Deans and Unit Heads

FROM: Peter Low

RE: IMPORTANT – New Policy on Disposal of Regulated (Hazardous) Materials

I enclose a new University policy on disposal of regulated (hazardous) materials. It becomes effective on December 1, 1999. It has been approved by Leonard Sandridge for application to all units that report to him, by Bob Cantrell for all units that report to him, and by me for all units in my area.

I ask that you distribute it widely to anyone working in areas that report to you who may come in contact with such materials during the course of University work.

I ask also that you take steps to insure that each affected person reads and understands the policy and is aware of both the importance of compliance and the significance of non-compliance.

Compliance with state and federal law on these issues is a *very* serious matter. It is important for us to be good environmental citizens. As some of you know, moreover, the sanctions for continued violations can be quite severe – hundreds of thousands of dollars and, in the case of some Universities, millions.

The policy relies on a management structure under which deans, unit heads, and directors of administrative units are ultimately responsible for cleanup issues that occur within areas under their control. This means that it must be your management responsibility to assure that processes are in place to prevent violations from occurring.

Everyone who works at the University needs to understand that this as a situation of zero tolerance for violations. The reason is that the state and federal inspection agencies so treat it. We can be fined for a single violation, in other words, even though there are thousands of situations we are getting right.

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Ralph Allen and the others who work in the Office of Environmental Health and Safety are available to help you and your units understand the law. They can also assist in the drafting of policies.

Ralph is required by law to conduct random inspections. The attached policy requires that he notify you and me of any violations that he discovers so that we can take appropriate remedial action. As I say above, if the federal or state agencies discover violations on their inspections, it is likely that substantial fines will result.

I urge you to find a way to hold your various unit supervisors, laboratory directors, faculty, and staff responsible for fixing this problem. I cannot overemphasize the need systematically to address this problem and the seriousness of the consequences if we fail.

PWL:ph

Enclosure

Cc: John T. Casteen III, President
Leonard W. Sandridge, Jr., Executive Vice President and Chief Operating Officer
Robert W. Cantrell, Vice President and Provost, Health Sciences
Gene Block, Vice President for Research and Public Service
Ralph Allen, Director, Office of Environmental Health and Safety