



**A Message from the
New England Laboratory XL Project Coordinator**

**PROJECT XL SUMMARY REPORT
November 14, 2006**

On the following pages, you will find the campus reports from Boston College, the University of Massachusetts-Boston and the University of Vermont on their experience and progress as participants in the New England Universities Laboratory XL Project. We welcome your review.

From our perspective, the XL Project has gone national. With the publication on Tuesday, May 23, 2006 of the “Standards Applicable to Generators of Hazardous Waste; Subpart K – Standards Applicable to Academic Laboratories; Proposed Rule” by the U.S. Environmental Protection Agency, the Lab XL “experiment” in New England became national news. Finally, after nearly 7 years of the Lab XL negotiation and project implementation, a flexible, performance-based regulatory framework for managing hazardous wastes in laboratories was proposed as a national model. We are thrilled that the proposal includes many of the basic principles and elements first tested in this project. We are further pleased that many of our lessons learned and insights about laboratory environmental management are incorporated into a regulation that is more streamlined and simpler than the rule that we have piloted. The Campus Consortium for Environmental Excellence also provided extensive comments on the proposed rule and advocated for certain revisions, which we believe are critical to the successful acceptance of the rule by academic institutions.

While we hope that a national regulation is quickly finalized, **we were disappointed that the extension for the Laboratory XL Project was limited to less than three years.** The expiration date was extended until April 15, 2009. Based on the number of responses to the proposed rule and the uncertain acceptance of the regulatory model by certain states, we expect that a national rule will take some time to finalize. We should further note that we applaud the efforts of EPA New England in serving as a champion of an academic laboratory waste rule, and appreciate the support and constructive suggested revisions to the proposed rule provided by the Massachusetts Department of Environmental Protection and the Vermont Department of Environmental Conservation.

The 2005/2006 reports continue to paint a picture of three institutions that manage laboratory wastes under distinct constraints, cultures and opportunities. For example, Boston College continues to see rapid growth of its science programs, as witnessed by the doubling of the number of graduate students this past year. A major focus at BC is therefore training of laboratory workers, mentoring of key laboratory personnel and building a lab safety culture in an ever-changing laboratory environment. University of Massachusetts Boston has seen major resource constraints over the past few years and has therefore focused its effort on clear, simple and effective management within the

laboratory, with EH&S focusing more on oversight rather than new initiatives. UVM's program continues to mature. Based on laboratory worker suggestions and lab safety inspections, they have reconfigured their training, lab safety audits and web resources to better provide consistent and coherent information and effectively articulate clear performance expectations.

This year's reports are focused on the core laboratory waste management issues and the key metrics tracked by each of the institutions. With the publication of the proposed rule, the Lab XL institutions believe that it is appropriate to focus less on providing data and offering insights to support a national rulemaking, and more on managing and improving the programs at their respective institutions. We continue to keep an eye on the Lab XL prize, which we believe is a reduction in high risk chemicals in the laboratory, a community of laboratory workers literate in lab safety and committed to pollution prevention, demonstrable conformance with institutional lab safety standards, and a reduction in chemical wastes generated in the laboratory. All of the institutions are making significant strides with respect to training, worker literacy, laboratory conformance and, most importantly, a reduction in quantity and hazard of chemicals in the laboratory. For example, all three institutions believe there is a decline in outdated chemicals, and p-listed wastes and hazardous chemicals of concern (e.g., organic peroxides), which likely speaks to the strong and effective management at each of the schools. Laboratory hazardous waste generation rates, however, continue to vary between institutions. The University of Vermont reports a nearly 20% reduction in waste generation. The University of Massachusetts Boston reports relatively stable waste generation rates, while the doubling of science graduate students at Boston College is resulting in a significant increase in waste.

The complete story will unfold as you review the individual reports. We look forward to your review. Please contact me, or the Lab XL contacts at each institution, if you have additional questions, comments or information to share.



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