RCRA Information Center Docket Clerk (5305W)
U.S. Environmental Protection Agency (EPA, HQ)
401 M Street, SW Washington, D.C. 20460
Attn: Docket No. F-1999-NEUP-FFFFF

Boston University's Comments on EPA's Proposed Project XL Site-Specific Rulemaking for University Laboratories (64 FR 40695-40715)

Boston University (the "University") submits the following comments on U.S. Environmental Protection Agency's (EPA) proposed rule for Project XL Site-Specific Rulemaking for University Laboratories (the "Proposed Rule"). The notice was published in the 27 July 1999 Federal Register (64 FR 40695-40715).

Boston University is the second largest independent university in the United States with approximately 30,000 students and hundreds of laboratories on two campuses. The University is a member of the Laboratory Consortium for Environmental Excellence (LCEE), the Campus Safety Health and Environmental Management Association (CHEMA) and the Environmental Health and Safety Group of The Boston Consortium for Higher Education.

In the last two years, the University's laboratory waste management program has been significantly improved as part of a larger effort to implement comprehensive environmental health and safety (EHS) management systems throughout the University. For example, in April 1999, the University published an EHS Policy Manual to assist the University community in better understanding key EHS programs. The Manual also includes an EHS Statement of Commitment from the President of the University. Additionally, the University's Office of EHS has instituted several innovative EHS programs such as web-based safety training for lab personnel and a bar-coded, computerized chemical inventory system.

Boston University supports the Proposed Rule and commends EPA, U. Mass-Boston, Boston College and the University of Vermont in this innovative project. From the University's perspective, RCRA is not well suited for a university laboratory setting. The strict RCRA regulatory scheme was designed for regulating 55-gallon drums instead of hundreds of small laboratory containers. RCRA's detailed prescriptive standards are not practical in a university research laboratory and do not promote superior environmental performance.

A new flexible regulatory model is essential and the proposed laboratory Environmental Management Plan is a logical and realistic approach. Environmental management plans and systems, such as ISO 14001, are increasingly being utilized to promote continuous EHS improvement while recognizing the unique character of each institution.

One caution, however, is in order. If successful, Lab-XL should be considered for wider application, but only as an alternative to RCRA and not as a substitute. It is also important to note that some schools may not be able to adopt the Lab-XL approach because of their unique operations and EHS culture.

In conclusion, Boston University strongly supports this forward-looking project. The University encourages EPA to make the most out of this experiment and to consider allowing maximum flexibility since there is much to be learned.

If you have any questions please contact Peter Schneider, EHS Director, Boston University at 704 Commonwealth Ave., Boston MA 02215 or at (617) 353-4094 or schnider@bu.edu