Tom.
FYI
The Slides for
CSHEMA 98.
Suzanne

Project XL
An Alternative System for Regulating Hazardous Waste in Academic Laboratories

"XL is a national pilot program that tests innovative ways of achieving better and more cost effective public health and environmental protection. Through site specific agreements with project sponsors, EPA is gathering data to help the Agency redesign current approaches to public health and environmental protection."

US EPA Project XL - *eXcellence and Leadership*

Suzanne Howard
Director
Environmental Health and Safety
Boston College

Laboratory Consortium for Environmental Excellence (LCEE)

- First meeting held Feb. 1996
- Incorporated as a non-profit in August 1997
- The LCEE is a solutions oriented group dedicated to identifying, developing, and sharing best environmental practices in labs.
- Members Include:
  - Boston College
  - Georgetown University
  - Harvard University
  - Northeastern University
  - Trinity College
  - Tufts University
  - Univ Mass-Boston
  - Univ Mass-Amherst
  - University of Vermont

Project XL Criteria

- Superior Environmental Results
- Cost Savings & Paperwork Reduction
- Stakeholder Support
- Innovation/Multi-Media Pollution Prevention
- Transferability
- Feasibility
- Monitoring, Reporting & Evaluation
- Avoiding Shifting of Risk

The Proposal

- Implement flexible, performance based

Why Change is Needed

- High penalties for noncompliance
- Otherwise adequately regulated (ie. OSHA's Laboratory Standard)
- Labs unique culture, expertise and products
- Hazardous waste regulations were written for industry
- Overlapping jurisdictions - Federal, State, Local
- Enforcement variations overtime, inspector, region
- Organizational management in a University setting

- Increasing regulations and enforcement
- standards for managing hazardous wastes in laboratories
  - Environmental Management Plan (EMP
- Move point of waste determination outside the laboratory
- Obtain EPA guidance on treatment containers

Current Status

- Final Project Agreement (FPA) being developed
- Categorical Exclusion or Modify Defn.
- Funding Sources
- Local Stakeholder Involvement
- Finalize EPIs
- EPA Developing Rulemaking for FR
- Enforceability Issues

Stakeholders

- **Locally**
  - » Community Groups
  - » Faculty & Staff
  - » Fire Departments
  - » State Regulators
  - » Students
  - » Water Authorities
- **Nationally**
  - » Organizations
    - – CSHEMA
    - – American Chemical Society
    - – Nat'l Academy of Sciences
    - – Ecologia
    - – Tellus Institute
    - – Howard Huges Medical
  - » Commercial labs
    - – Pfizer Inc.
  - » Many Universities
    - – Colorado College, Cornell, MIT, Stanford, Univ. of CT, MN, WI, IL, many others
  - » Los Alamos Nat'l Lab

The Future

FPA this Fall
tation, Monitoring & Reporting
r Pilot Study
ools may enter pilot program after
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sful - EPA will enact - can be adopted by

cessful - pilot schools back to RCRA in

Potential Problems

- States ultimately have the authority to accept or reject the new scheme
- Some hazardous waste managers feel the EMP is more stringent than existing regulations
- Implementation of EMP will require lab personnel buy-in to their responsibilities

- Sign the F
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- Four Yea
- More sch 18 month
- Evaluatio
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  - » Not Suc labs

portant Advantages

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h)
lates OSHA and EPA
nents into a single plan
lly useful for other
nental impacts (air emissions,
ncy response)

With Special Thanks To:

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  - » Michael Last
  - » Tom Balf
- EPA
  - » Anne Kelly
  - » Gina Snyder

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