State of Vermont

Department of Fish and Wildlife
Department of Forests, Parks and Recreation
Department of Environmental Conservation
State Geologist
RELAY SERVICE FOR THE HEARING IMPAIRED
1-800-253-0191 TDD>Voice
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AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation
Waste Management Division
Hazardous Waste Program
103 S. Main St./West Office Bldg.
Waterbury, Vermont 05671-0404

September 8, 1997

Ms. Milly Archer
University of Vermont
Environmental Safety Facility
655D Spear Street
P.O. Box 50570
Burlington, VT 05405-0570

Dear Ms. Archer,

In response to our telephone conversation this morning, I am writing to confirm that the Vermont hazardous waste program fully supports EPA's XL Program, and more specifically, your efforts to explore more efficient and protective procedures for the management of hazardous waste from educational institutions and laboratories. Of course, I speak only for the program I'm responsible for, and my support is for the investigation of alternatives by the workgroup, not any particular outcome that the workgroup may arrive at in the future.

It is our opinion that the current RCRA system is less than optimal in the setting of a university or laboratory, where a strict application of RCRA is not the most serviceable way to arrive at the goal of safe and efficient laboratory waste management. In addition, the existing RCRA system can be a deterrent to resource conservation through chemical exchange and reuse. It is our understanding that your group will be exploring alternative handling, storage, identification, inventory, and site definition protocols for hazardous waste at educational institutions and laboratories.

I wish you well in your quest to improve upon the RCRA system. It is a goal we share within the Vermont RCRA program, and with EPA. Please let me know if I can assist you further in your efforts.

Sincerely,

Peter W. Marshall
Chief, Hazardous Waste
Management & Prevention Section