



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

**PROJECT XL SUMMARY REPORT
August 15, 2005**

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, it has been a good year. We applaud the Environmental Protection Agency's efforts to address issues associated with the management of chemical waste in laboratories. First, the Agency issued a guidance memo on March 17, 2004 on managing hazardous wastes in Satellite Accumulation Areas, which clarified some issues. Second, the Agency continues to work diligently and thoughtfully on developing a proposed rule for college and university laboratories, which we hope will be published in early 2006. This year's Project XL web page includes a Powerpoint presentation by Kristin Fitzgerald of the U.S. EPA which gives a status report on the rulemaking, as of July 2005. The rulemaking momentum has clearly drawn energy from the collaboration of key college and university associations participating in the U.S. EPA Sector Strategies Program. This program has successfully brought together many of the parties who have argued for years for the need to reform the regulations governing hazardous wastes in laboratories and replace the prescriptive requirements with a performance-based rule. Finally, there appears to be an emerging consensus within higher education of the core elements of effective laboratory waste management upon which a rule will be built. We're proud of our role in piloting the Lab XL, generating volumes of actual lab waste management data, and providing insights to contribute to this national dialogue.

I believe that this report is our most important and most insightful. This report is being issued at a momentous time. With the national proposed rulemaking timetable in mind, EPA New England proposed six questions for the Lab XL Participants to answer for the purpose of informing the national conversation. Our "Responses to Key Regulatory Questions Posed by EPA" are designed to provide insight and suggestions regarding potential provisions of a performance-based laboratory standard.

In past years, we have presented performance data for the nine EPIs as if each of the nine indicators were equally important and relevant. With nearly six years of implementing and measuring environmental performance, the three institutions are now in an informed position to say what worked, what didn't work according to plan, what performance measures are helpful and what measures are no longer useful. This year, each campus illustrates its priority EPIs, yet provides context for these decisions based on the maturity of its lab waste management system and the alignment of its priorities with the Environmental Health and Safety Department's strategic vision and resources.

Finally, the full report for each campus – responses to EPA questions, scorecard, and data results – presents a most compelling story of the subtle differences between these institutions. Differences in lab waste management design, implementation strategies, and priorities are based on:

- Unique waste generating activities at each campus
- Size and scope of laboratory activities across campus
- Available University and EHS resources
- Distinct administrative, management and organizational styles

The benefits of a regulatory standard that allows for flexible and innovative approaches to achieve agreed upon performance standards is apparent.

Next year may be even more exciting. The proposed rulemaking should be published in early 2006 and we will surely comment on that proposal. Additionally, we plan to host a workshop in Spring 2006 on the topic of how best to normalize hazardous waste generation from laboratories. It is our hope that the C2E2 can play an instrumental role in bringing together experts to identify key normalization factors to quantitatively explain the year to year variations in the amount of RCRA waste generated by higher education research laboratories. We regard this step as critical in gauging pollution prevention success in laboratories in the years ahead.

We have one more report – due next summer, 2006 – and our project is due to expire in September 2006. We need to determine a potential temporary legal authority to extend our project, once again, in the likely event that a final rule will not be in place before our project deadline.

We continue to work with our colleagues at other universities in sharing ideas and comparing practices to enhance lab waste management on campus and minimize environmental issues and impacts associated with research activities. Many campuses are experimenting with best practices to help laboratories reduce their hazardous chemical use and waste generation in imaginative ways. As the nature of laboratory research continues to evolve in more interdisciplinary directions, environmental managers in higher education are challenged to keep up with these changes. We believe that the laboratory management system approach utilized in the Lab XL is superior to the traditional RCRA approach because it allows for flexible waste management options, while assuring prudent management of those chemicals that present environmental hazards.

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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