US EPA ARCHIVE DOCUMENT

UVM Stakeholders' Meeting Agenda
January 15, 1998

I. The Problem: Regulatory Compliance in Labs

A. OSHA regulations

1. Lab standard
2. Exposure limits

B. EPA/DEC regulations

1. Hazardous Waste
2. Clean Air Act

C. Inspection policies/history

1. OSHA responds to complaints/accidents

a) Every inspection includes review of hazard communication and laboratory chemical hygiene plan

b) UVM hasn't been inspected since about 1990

c) Fines are in the $10,000 range

2. EPA/DEC conducts about annual inspections of the hazardous waste program

a) Nationally, fines have been escalating rapidly: $1M for Stanford, $300K for Yale, UConn, $2.2 for BU

b) UVM has a fine history of $10,000 (1988), $40,000 (1992)...

II. Project XL

A. Part of the Government Reinvention Effort

B. EPA will provide regulatory relief in exchange for "environmental performance improvements"

C. Why UVM?

1. Help establish a national baseline for academic labs safety programs
2. Enable us to put together a single program for OSHA and EPA
3. Resolve outstanding inconsistencies and regulatory interpretations that

are creating the large fines.

III. What are We Developing?

A. A regulation of the style of the OSHA lab standard

1. A short regulation which allows for local interpretation
2. A longer non-mandatory appendix which has suggested best practices, in the form of an EMS managing LPUs

B. LPUs will need to develop a Chemical Hygiene Plan that hooks into the EMS for environmental compliance issues

1. Flow chart example
2. CHP form example

IV. Outstanding Problems

A. Providing Enforceability to the EPA/DEC

B. Measuring Environmental Performance