

US EPA ARCHIVE DOCUMENT

Tom:  
FYI -  
The slides for  
CSHEMA 98.  
Suzanne

## Project XL

### An Alternative System for

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*

"XL is a national pilot program that tests innovative ways of achieving better and more regulatory hazardous waste management in Academic Laboratories"

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

- Implementation flexible performance based

- 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

## Why Change is Needed

- 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
  - » Telus Institute
  - » Howard Hughes 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

### Potential Problems

FPA this Fall  
 Installation, Monitoring & Reporting  
 Pilot Study  
 Schools may enter pilot program after  
 6 months  
 EPA will enact - can be adopted by  
 successful - pilot schools back to RCRA in

- 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...
- Implementer
- Four Year
- More sch... 18 month
- Evaluation
  - » Success... others
  - » Not Suc... labs

### Important Advantages

line with regulatory priorities  
 compliance orientation, EMS  
 (h)  
 integrates OSHA and EPA  
 elements into a single plan  
 very useful for other  
 potential impacts (air emissions,  
 emergency response)

### With Special Thanks To:

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

### Imp

- Falls in l... (preform... approach)
- Consolid... requirement
- Potential... environmental... emergency