US EPA ARCHIVE DOCUMENT

NEUP-00001

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August 10, 1999

RCRA Information Center Docket Clerk (5305W)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460.

AUG 12

Docket Number
F-1999-NEUP-FFFFF.

Project XL Site-specific Rulemaking for University Laboratories

Dear EPA:

I am writing to strongly support the Project XL for University Laboratories to be implemented in three New England Universities.. This is an important step in moving toward performance-based standards for managing hazardous wastes in university laboratories and is consistent with efforts supported by various professional agencies. I have been involved with the California Department of Toxic Substances Control which is just now completing implementation of regulations closely related to those which the EPA is proposing herein.

Although the volume of hazardous wastes from academic laboratories is small, it is still very important that these quantities be managed in a manner that protects the environment as well as personal safety. Academic laboratories, because of the large variety and small quanities of waste, are an ideal arena to test this new regulatory approach. The faculty and staff, for the most part, are well informed about the hazards of the chemicals they handle and are capable of developing and implementing a sound management plan. The example and training for students, our future scientists and citizens, will be an important added advantage of this experiment.

Sincerely,

Stanley H. Pine
Professor of Chemistry and
University Chemical Safety Officer