

Re:

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ENVIRONMENTAL PROTECTION AGENCY
[FRL-6709-6]

Policy or Regulatory Flexibility as Incentive for Improved
Environmental Performance at Laboratories

Northeastern University is pleased to provide comment regarding EPA's request to identify specific examples of environmental regulations or policies, under which the benefit appears small compared to the implementation burden faced by the affected labs, as outlined in the above cited Federal Register notice.

The requirement in the Hazardous Waste (RCRA) regulation that says a container that is filled, must be moved from the satellite accumulation area within three days (3-day rule), is the one I believe to be most problematic for colleges and universities. Certainly colleges and universities can make sure all these filled containers are removed from the satellite accumulation areas, but this comes at significant cost of personnel and resources. Instead of picking up waste on an efficient regular schedule, colleges and universities are forced to move waste all the time, as satellite accumulation areas can number anywhere from 10 - 1,000, or even more. The more frequently waste needs to be moved, the greater the potential for threats to health, safety and the environment. The net effect of the "3-day rule" in a college and university setting, is decreased protection of health, safety and the environment. This rule was developed for industry and works well there, because of their few large waste streams, point of generations and satellite accumulation areas. However, in a college and university setting, with many small waste streams, point of generations and satellite accumulation areas, this rule does not work and has a negative impact on health, safety and the environment. Allowing colleges and universities to store hazardous waste at satellite accumulation areas for up to 30 days, would improve environmental performance in laboratories, which both EPA and colleges and universities are looking to achieve.

We would be interested in participating in a pilot project related to the "3-day rule" to receive flexibility as part of Project XL and the Labs21 program.

We appreciate the opportunity to comment and hope this will be beneficial to your efforts.

If you have any question or require additional information, please do not hesitate to contact me. Thanks.

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