

Message

From: StClair, Christie [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=06618C5ED0E744A3BFE8443360018C26-STCLAIR, CH]
Sent: 11/8/2017 3:26:05 PM
To: Kelly Mayes Ex. 6
CC: Press [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b293283291dc44e0b5d1c36be9281d8a-Press]
Subject: RE: Reporter request

Hi Kelly, please attribute to an agency spokesperson.

The RCRA Subtitle C program was implemented to address the cradle-to-grave management of hazardous waste generated by industry, municipalities and others. Although we often think of the hazardous waste regulations as applying to hazardous wastes generated by manufacturers and other industries, it applies to anyone (other than a household) that generates hazardous waste, including those that generate retail waste, electronic waste, and laboratory waste.

Regulations are usually initiated at the federal level and implemented by states with approved programs, and by EPA's regional offices ([click here](#) to see a map of EPA's 10 regions) in states that do not have an approved program. Implementation consists of enforcing EPA rules via inspections, compliance assistance, and enforcement actions. All states must adopt any EPA rules that are deemed to be "more stringent than" the RCRA Subtitle C base program. If a rule is "as stringent" or "less stringent," states can choose whether or not to adopt.

Until 2008, when EPA finalized Managing Hazardous Waste at Academic Laboratories Rulemaking (a.k.a., the Academic Labs Rule), hazardous waste generated at academic laboratories was subject to the same set of hazardous waste generator regulations as an industrial hazardous waste generator. The Academic Labs Rule was added to the RCRA program to help labs at universities and university-affiliated labs comply with RCRA regulations. The variability of the hazardous waste that is generated at academic labs, combined with the fact that the hazardous waste is often generated by students, often makes it difficult for academic institutions to comply with standard RCRA regulations. The Academic Labs Rule was developed in response to numerous requests from academic institutions for federal assistance to adapt the RCRA regulations to better fit the operations of academic laboratories. The rule is a customized approach that upholds RCRA's mandate to protect human health and the environment while accounting for the unique challenges faced by academic laboratories by allowing for alternate methods for accumulation times, accumulation areas, labeling, training, and more. However, because it is considered "as stringent as" (and not more stringent than) the RCRA Subtitle C base program, states are not required to adopt it, and further, labs in states that have adopted it have the option to choose whether to operate under standard RCRA generator regulations or the Academic Labs rule.

To answer your question number three, there were a few prior incidents that brought to EPA's attention the need for improved compliance at academic laboratories. There were multiple occasions where containers of desiccated picric acid (which is extremely shock sensitive and highly explosive in its crystalline form) were discovered and bomb squads had to be called in to remove the hazard. One of the goals of the Academic Labs Rule is to avoid situations like these where chemicals are stored for years or even decades, and to encourage these labs to conduct regular cleanouts without the burden of having to comply with the full RCRA program as large quantity generators (LQGs).

A point of clarification: this rule only applies to hazardous waste generated in academic labs. Any other solid and/or hazardous waste generated elsewhere at the academic institution must be managed under all other applicable RCRA regulations—that is, no other areas of the academic institution where hazardous waste is generated are allowed to take advantage of the Academic Labs Rule.

Here are some links you might find helpful:

- [Overview of the Hazardous Waste Program](#)
- [Overview of the Labs Rule.](#)
- [Labs Rule in the Code of Federal Regulations](#)

From: Kelly Mayes [Ex. 6]
Sent: Tuesday, November 07, 2017 5:18 PM
To: StClair, Christie <StClair.Christie@epa.gov>
Subject: Re: Reporter request

Hi Christie,

Can't tell you how much I appreciate it!

Thanks,
Kelly

Ex. 6

From: StClair, Christie [Ex. 6]
Sent: Tuesday, November 7, 2017 3:44:28 PM
To: Kelly Mayes
Subject: RE: Reporter request

Hi Kelly,

Hoping to have something for you shortly.

Christie

From: Kelly Mayes [Ex. 6]
Sent: Tuesday, November 07, 2017 3:41 PM
To: StClair, Christie <StClair.Christie@epa.gov>
Subject: Re: Reporter request

Hi Christie,

I just wanted to follow up on the email conversation we had last Wednesday regarding the questions I sent you. Have you had a chance to look at them?

Sincerely,

Kelly Mayes
B.A Journalism and B.A Ecology
University of Georgia | Class of 2020

Ex. 6

From: Kelly Mayes
Sent: Wednesday, November 1, 2017 1:02:03 PM
To: StClair, Christie
Subject: Re: Reporter request

Hi Christie,

If you could have the information to me by next Tuesday (11/7) I would appreciate it. Thank you again for your help.

Kelly

From: StClair, Christie <StClair.Christie@epa.gov>
Sent: Wednesday, November 1, 2017 12:46:57 PM
To: Kelly Mayes
Subject: RE: Reporter request

Thanks, Kelly. What is your deadline?

Christie

From: Kelly Mayes
Sent: Wednesday, November 01, 2017 11:13 AM
To: StClair, Christie <StClair.Christie@epa.gov>
Subject: Re: Reporter request

Hi Christie,

Thank you for being willing to speak with me. I read the link you sent in the previous email and I'm still a tad confused about the process. Would you mind answering the following questions for me?

- 1) From what I read in the regulations, it seems like the universities have the ability to regulate themselves more or less for this process. Can you give me more insight in to some specific rules the EPA has put in place to regulate the processing of hazardous waste in universities?
- 2) Have there been any past incidents that led to the formation of these regulations?
- 3) What does the EPA require as far as the transportation and storage of these materials?
- 4) What does the EPA require as far as the disposal of these materials after they have left the university's labs?

Thank you very much for your help with this. I look forward to communicating with you in the future.

Sincerely,

Kelly Mayes
B.A Journalism and B.A Ecology
University of Georgia | Class of 2020

Ex. 6

From: StClair, Christie <StClair.Christie@epa.gov>
Sent: Tuesday, October 31, 2017 2:20:53 PM
To: Kelly Mayes
Subject: Reporter request

Hi Kelly,

I'm in EPA's public affairs office. We don't have anyone available for a call, but would be glad to respond to questions in writing.

Also, in case you haven't yet seen this site there may be useful info for you here:

<https://www.epa.gov/hwgenerators/managing-hazardous-waste-academic-laboratories-rulemaking>

Thanks,
Christie

From: Kelly Mayes

Ex. 6

Sent: Monday, October 30, 2017 7:15 PM

To: Gibbons, Dayna

Subject: Reporter Request: An interview about the EPA's regulations for processing chemicals in research facilities

Good evening,

I am a journalism major in UGA's Grady College of Journalism, and I am writing a story for one of my classes about the university's standards for dealing with hazardous waste.

The EPA's standards for chemical compliance in laboratories is an important piece of this story, and I am enthusiastic to learn about them. Would you be willing to share your knowledge on the subject in a phone interview on Wednesday (11/8) at 10:30 a.m.?

Sincerely,

Kelly Mayes

B.A Journalism and B.A Ecology

University of Georgia | Class of 2020

Ex. 6