



September 17, 2008

Susan Dudley
Administrator
Office of Information and Regulatory Affairs
U.S. Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Ms. Dudley:

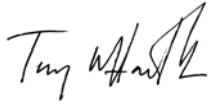
We understand that the U.S. Environmental Protection Agency (EPA) has recently submitted *Final Rule: Subpart K – Standards Applicable to Academic Laboratories* for review by the Office of Management and Budget (OMB). The academic community, represented by the American Council on Education, the National Association of College and University Business Officers and the associations listed below, urges OMB to expedite review of this rule to allow EPA to publish the rule in *The Federal Register* by November 1, 2008.

We expect that the rule as submitted represents a thoughtful effort to design standards that are appropriate to the facilities and programs that are being regulated. The academic community has long been burdened with standards that were designed for large-scale industrial operations and are incompatible with the academic research and teaching environment. The EPA has recognized, and sought to alleviate, the struggles of the higher education community in attempting to comply with ill-fitting regulations written for industrial applications. This rule is a culmination of extraordinary efforts on the part of the EPA and the higher education community carried out over several years which we trust addresses the concerns we presented to EPA in 2006.

We hope that these important regulatory reforms will be adopted in final during this administration. We did recommend several changes to the proposed rule during the comment period, which we hope will be reflected in the final rule. We would be pleased to discuss our comments further with you or your staff. In any case we do not wish to lose the opportunity to complete this important and sensible re-design of rules governing academic laboratories.

Please contact Anne Gross, vice president for regulatory affairs at NACUBO at (202) 861-2544 or anne.gross@nacubo.org for additional information.

Sincerely,



Terry Hartle
Senior Vice President
American Council on Education



John Walda
President
National Association of College and
University Business Officers

The undersigned associations join in this letter:

Association of American Medical Colleges
American Chemical Society
American Council on Education
Association of American Universities
Campus Safety, Health and Environmental Management Association
National Association of College and University Business Officers
National Association of State Universities and Land-Grant Colleges

cc: Susan Bodine, Environmental Protection Agency
Steven Johnson, Environmental Protection Agency
Courtney Higgins, Office of Management and Budget
John Marburger, Office of Science and Technology Policy