

July 23, 1985

Jarrell R. Hagan, Director  
Department of Safety  
Wright State University  
Dayton, OH 45435

Dear Mr. Hagan:

Thank you for your letter of July 19, 1985, requesting clarification concerning the regulation of laboratory wastes contaminated with certain chlorinated dioxins (CDDs) and dibenzofurans (CDFs).

On January 15, 1985, EPA issued a regulation designating wastes containing certain CDDs and CDFs as EPA acute hazardous wastes. Such wastes are subject to RCRA regulations. In general, these regulations do not cover wastes that are generated as a result of laboratory operations. Materials such as stock solutions, spent solvents, laboratory clean up materials, chromatographic columns, etc. are not subject to the RCRA regulations even though they may contain CDDs or CDFs. Therefore your paragraph three is correct.

However, the unused portion of a RCRA hazardous waste handled by the laboratory is a RCRA hazardous waste. The statement in paragraph four of your letter is therefore not correct.

If you have additional questions, please do not hesitate to call me (at 202/382-489).

Sincerely yours,

Judith S. Bellin, Ph.D.  
Biochemist

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