

9444.1994(10)

December 1994

HOTLINE QUESTIONS AND ANSWERS

3. Epinephrine Residue In A Syringe Is Not P042

A hospital administers the drug epinephrine to patients by injection with a syringe. After the proper dose is injected, excess epinephrine and epinephrine residue remain in the syringe. Epinephrine appears on the P-list of hazardous wastes at 40 CFR 261.33(e) as P042. Is the epinephrine remaining in the syringe a P-listed hazardous waste when the syringe is discarded?

The epinephrine in the discarded syringe would not be classified as a listed hazardous waste. The P-list of hazardous wastes applies to unused discarded commercial chemical products. Commercial chemical products are defined as commercially pure grades and technical grades of the listed chemicals or chemical formulations in which the listed chemical is the sole active ingredient, which have not been used for their intended purpose (54 FR 31335, 31336; July 28, 1989). Drug residues often remain in a dispensing instrument after the instrument is used to administer medication. EPA considers such residues remaining in a dispensing instrument to have been used for their intended purpose. The epinephrine remaining in the syringe, therefore, is not a commercial chemical product and not a P042 hazardous waste. The epinephrine could be a RCRA hazardous waste, however, if it exhibits a characteristic of hazardous waste.