

9444.1986(16)

AUG 18 1986

Mr. Randy L. Porter  
Industrial Hygienist  
University of Kansas Medical Center  
Safety Office  
39th and Rainbow Blvd.  
Kansas City, Kansas 66103

Dear Mr. Porter:

This is in response to your July 8, 1986, letter in which you request written clarification as to whether your laboratory waste, generated by an investigator performing research using stock solutions of 2,3,7,8-tetrachloro-dibenzo-p-dioxin (TCDD), is covered by the dioxin listings (EPA Hazardous Waste Nos. F020, F021, F022, F023, F026, or F027). These wastes include animal carcasses, bedding, feces, urine and other "typical" laboratory dry waste such as paper goods, gloves, syringes, etc.

The wastes which you described are not the listed dioxin-containing wastes under 40 CFR §261.31. These wastes would more appropriately be defined at 40 CFR §241.101(h) as infectious waste, "...laboratory wastes, such as pathological specimens (e.g., all tissues, specimens of blood elements, excreta, and secretions obtained from patients or laboratory animals) and disposable fomites (any substance that may harbor or transmit pathogenic organisms) attendant thereto.....". To date, EPA has not promulgated criteria for identifying waste as infectious under §261 Subpart C. The Agency has, however, developed a manual to provide guidance on the management of infectious waste. A copy is enclosed for your reference.

I hope this adequately answers your questions. If you have any further questions, please contact Doreen Sterling of my staff.

Sincerely yours,

Matthew A. Straus  
Chief Waste Characterization Branch

Enclosure

RO 11172