

9444.1986(30)

December 10, 1986

Curtis Verploegh
Hazardous Waste Manager
The University of New Mexico
Occupational Safety
Medical Building 3, #137
Albuquerque, NM 87131

Dear Mr. Verploegh:

This is in response to your October 21, 1986 letter in which you requested clarification as to whether your laboratory waste, generated by an investigator, performing research involving 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD) is covered under 40 CFR §261.31. The wastes in question are: 1.07 mg of TCDD contained in some 361 mouse carcasses, 450 gallons of cages and bedding, and 41 gallons of dry waste.

The wastes which you described are not the listed dioxin-containing wastes under 40 CFR §261.31. Rather, these wastes would more appropriately be characterized as infectious wastes, "... laboratory wastes, such as pathological specimens (e.g., all tissues, specimens of blood elements, excreted, and secretions obtained from patients or laboratory animals) and disposable fomites (any substance that may harbor or transmit pathogenic organisms) attendant thereto..." see 40 CFR §261.101(h). 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. You should be aware that typical infectious waste incinerators are probably not satisfactory devices for disposal of materials highly contaminated with TCDD. TCDD decomposes above 800C. These wastes which you describe can be safely managed by high temperature incineration.

I hope this adequately answers your questions.

Sincerely yours,

Doreen Sterling, Ph.D.
Chemist
Waste Characterization Branch

Enclosure

cc: Matt Straus

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