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OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

MAY 14 1987

Barbara J. Zellmer
Hazardous Waste Regulatory Unit
Department of Natural Resources
Box 7921
Madison, WI 53707

Dear Ms. Zellmer:

This is in response to your April 22, 1987 letter in which you request clarification of the Resource Conservation and Recovery Act (RCRA) regulations governing the management of waste containing dioxins (2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD)). In particular your question relates to a notification received from the University of Wisconsin regarding research projects involving injection of dilute solutions of TCDD into birds and bird eggs. The University has inquired about the proper disposal of these carcasses containing small quantities of TCDD.

The waste which you described is not listed under 40 CFR §261.31, nor is its disposal currently regulated under the Toxic Substances Control Act (TSCA). Rather, these wastes would more appropriately be characterized 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..." see 40 CFR §241.101(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 800°. Therefore, if the waste is to be incinerated, the wastes which you describe should be managed by high temperature incineration.

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-2-

I hope this adequately answers your questions. If you have any further questions, please contact Doreen Sterling of my staff at 202-475-6775.

Sincerely,

Original Document signed

Marcia Williams, Director
Office of Solid Waste

Enclosure