

OCT 22, 1986

Roland R. Luxenburg
Aquatics Inc.
Environmental Services
75 Green Mountain Drive
South Burlington, Vermont 05401

Dear Mr. Luxenburg:

This is in response to your September 15, 1986, letter in which you requested EPA verification that incineration of laboratory wastes, such as paper towels, pipets, and laboratory gloves, which have come in contact with TCDD laboratory standards, is an acceptable disposal method. First, it should be noted that the laboratory wastes which you described in your letter are not included in the dioxin listings, F020-F023 and F026-F028. Therefore, you are not required to manage these wastes in accordance with the special management standards promulgated under RCRA.

Nevertheless, EPA believes that these wastes must be carefully managed. We, therefore, recommend that these materials be handled by using the same technologies as for handling radioactive or infectious wastes. Incineration in a "good" incinerator is one such technology.

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 Yours

Matthew A. Straus
Chief
Waste Characterization Branch

Faxback 11188