

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 21, 1990

Mr. Richard J. Alampi
New Jersey Veterinary Medical Association
66 Morris Avenue
P.O. Box 359
Springfield, NJ 07081

Dear Mr. Alampi:

Thank you for your letter dated April 20, 1990, regarding the regulation of animal carcasses under the Part 259 regulations. As you are aware, Section 259.10(a) defines medical waste as "solid waste generated in the diagnosis, treatment (e.g., during the provision of medical services), or immunization of human beings or animals, in research pertaining thereto, or in the production of testing of biologicals." Regulated Medical Waste (RMW) is a subset of the medical waste stream. The seven RMW classes are listed and described in Section 259.30(a).

Your question specifically related to the disposal of animal carcasses resulting from the treatment and/or diagnosis of an animal which has been isolated because it is suspected of having rabies. The regulation describes two situations where animal carcasses would be RMW. Class 5 RMW includes contaminated animal carcasses, body parts, and bedding of animals that were known to have been exposed to infectious agents during research, production of biological., or testing of pharmaceuticals. Thus, veterinarians treating or diagnosing animals which were not intentionally exposed to infectious agents during research, testing of biological. or pharmaceuticals, would not be regulated.

However, Class 6 RMW (Isolation wastes) are described as "biological waste and discarded materials contaminated with blood, excretion, exudates., or secretions from humans who are isolated to protect others from certain highly communicable diseases, or isolated animals known to be infected with highly communicable diseases." Therefore, specimens from animals which are isolated due to suspected infection with rabies and are sent to a laboratory for testing would be considered RMW upon disposal.

The carcass which is generated when the head is removed from the animal would also be considered a RMW; however, there are several options available for the disposal of the carcass. The generator of the waste could manage the carcass as a RMW in accordance with all the requirements of Part 259. Alternatively, Section 259.50(c) indicates that generators who either treat and destroy or dispose of RMW on-site through incineration, burial or sewer disposal are not subject to the tracking requirement for that waste.

The state of New Jersey may have additional state specific requirements for this type of waste. Please check with the New Jersey officials in regard to this matter.

If you need further assistance or have additional questions please contact Lisa Warren 202-475-9324 or Mary Greene at 202-475-7736.

Sincerely,

Susan Bromm, Director
RCRA Enforcement Division

cc: Mary Greene
Bob Confer
George Meyers
Austine Frawley

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