

9443.1986(12)

MAY 23 1986

Mr. Frank Neiderkofler  
Supply Service (95)  
Veterans Administration  
810 Vermont Ave., N.W.  
Washington, D.C. 20420

Dear Mr. Neiderkofler

As we discussed last Friday, the National Association of Photographic Manufacturers (NAPM) provided data to the Agency to indicate that used x-ray films, in and of themselves, do not appear to be hazardous under RCRA. Therefore, used x-ray films are probably not subject to the Federal hazardous waste management regulations (see enclosure.) You should be aware, however, that each generator is still responsible for making this determination.<sup>1/</sup> In addition, wastes not hazardous under EPA's regulations may be hazardous under authorized State programs. You, therefore, need to contact the States to determine the regulatory status of these films under their program.

Please feel free to give me a call if I can be of any further assistance; my telephone number is (202) 475-8551.

Sincerely,

Matthew A. Straus  
Branch Chief  
Waste and Identification Branch

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1/ If the generator determines that these films are hazardous, the only requirements under the Federal regulations imposed upon the generator would be to get an identification number and to comply with the uniform hazardous waste manifest.

RO 11158