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

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

APR 14 2008

Gary Chilcott, CEO/President
Sure-Way Systems, Inc.
P.O. Box 899
Deer Lodge, MT 59722

Dear Mr. Chilcott:

Thank you for your letter of February 20, 2007, in which you request a clarification on the December 1994 epinephrine syringe interpretation (RCRAOnline # 13718). Specifically, you requested that this interpretation be extended to other P- and U-listed drugs.

The 1994 epinephrine syringe interpretation states that the residual epinephrine contained in a used discarded syringe is no longer classified as a listed hazardous waste. This interpretation does extend to other P- and U-listed pharmaceuticals administered by syringe. However, please note that if residue remaining within a needle and syringe exhibits a characteristic, the needle and syringe would need to be managed as a RCRA hazardous waste. This interpretation only applies to syringes.

Finally, it is also important to note that the Agency has recently clarified that epinephrine salts are not included in the epinephrine P042 listing. Therefore, epinephrine salts and all delivery devices which contained them would be hazardous only if they exhibited one or more of the hazardous wastes characteristics (see "Scope of Hazardous Waste Listing P042 (Epinephrine)," RCRA Online #14778).

As with all federal RCRA interpretations, it is advisable that you contact your state or other local authority as their interpretation may differ from, or be more stringent than, this federal interpretation. Please contact Lisa Lauer at (703) 308-7418 or lauer.lisa@epa.gov, if you have any further questions.

Sincerely,

Robert W. Dellinger

Robert Dellinger, Director
Hazardous Waste Identification Division
Office of Solid Waste