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ANTI-NEOPLASTIC AGENTS IN HOSPITAL WASTES, DISPOSAL OF

JAN 30 1986

MEMORANDUM

SUBJECT: Disposal of Anti-Neoplastic Agents in Hospital Wastes

FROM: Jeff Denit, Deputy Director
Office of Solid Waste (WH-562)

TO: Kenneth D. Feigner, Chief
EPA, Region X
Waste Management Branch

The issue regarding possible hazards posed by anti-neoplastic drugs has been brought to our attention within the last couple of years. With large increases in both the numbers of anti-neoplastics available for use in chemotherapy and the number of patients being treated with these drugs, hospital personnel have express concern with handling and disposal of these chemicals (and materials contaminated with these chemicals).

Anti-neoplastics, as a class of chemicals, are not regulated under RCRA. However, the following are listed as hazardous waste under 40 CFR. 261.33(f):

- U035 Chlorambucil
- U058 Cyclophosphamide
- U059 Daunomycin
- U150 Melphalan
- U010 Mitomycin C
- U206 Streptozotocin
- U237 Uracil mustard

However, since these wastes are identified only as "toxic" wastes, under §261.22(f) they are subject to the standard small quantity generator exclusion. As a practical matter, this means that unless large volumes of the chemicals are discarded (i.e., 100 kg/mo or more) which in most cases is unlikely, or the facility is a large quantity generator, the majority of these wastes will remain unregulated.

The Agency is aware that manufacturers and health care facilities recommend incineration of anti-neoplastics and materials contaminated with these chemicals. Although there is no consensus among health care professionals as to the appropriate temperature necessary for destruction, many facilities are incinerating these wastes at temperatures between 1800°- 2200°F. Since the Agency has not investigated the efficiencies of incinerating these wastes, we have not provided guidance or taken a position with respect to this issue.

At this time, we have no plans to commit resources to the study of anti-neoplastics or to initiate any further rulemaking action. We recommend that State officials (in Seattle) contact the manufacturers of these drugs to gather information on recommended handling and disposal practices.