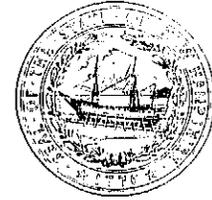




The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



**Thomas S. Burack, Commissioner**

November 5, 2007

Ms. Kathy Bizarro  
Executive Vice President  
New Hampshire Hospital Association  
101 Airport Road  
Concord, NH 03103

**Re: Hazardous Waste Regulatory Status of Epinephrine Salts**

Dear Ms. Bizarro:

The purpose of this letter is to document the New Hampshire Department of Environmental Services, Waste Management Division's (DES) concurrence with the United States Environmental Protection Agency's (EPA) October 15, 2007 Memorandum regarding the scope of hazardous waste listing P042 (epinephrine). Based upon DES's review of the EPA Memorandum and the New Hampshire Hazardous Waste Rules (Env-Wm 100-1100), we offer the following:

In the Memorandum signed by EPA Director of the Office of Solid Waste, Matt Hale, EPA clarified the P042 hazardous waste listing does not apply to epinephrine salts (see the enclosed Memorandum). Based on the information in the Memorandum, any chemical or formulation where epinephrine salt is the sole active ingredient is not a P042 listed hazardous waste when discarded.

In consideration of the EPA Memorandum, DES concurs with EPA's position taken that epinephrine salts are not included in the scope of the P042 hazardous waste listing. Please be aware that a chemical or formulation containing an epinephrine salt can still be regulated as a hazardous waste if it exhibits a hazardous waste characteristic under Env-Wm 403. Also, any commercial chemical product, as identified in Env-Wm 402.04, where epinephrine base (CAS# 51-43-4) is the sole active ingredient, is a P042 listed hazardous waste when determined to be a waste as defined in Env-Wm 110.

The DES P2 healthcare webpage will be updated accordingly to incorporate this clarification. Should you have any questions regarding this letter, please contact Robert Bishop, Waste Management Specialist, or me at 271-2942.

Sincerely,

John J. Duclos, Administrator  
Hazardous Waste Management Bureau  
Waste Management Division

DES Web site: [www.des.nh.gov](http://www.des.nh.gov)

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