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RCRA and the Identification of Hazardous Waste P-Listed Acutely Toxic Chemicals

The Resource Conservation and Recovery Act, or RCRA, enacted in 1976, identifies four categories of listed hazardous waste. Two categories of listed waste comprise chemical byproducts from manufacturing processes and do not generally apply to schools. The other two categories, codes P and U, specifically identify by name certain discarded commercial chemical products. Schools should be aware of the chemicals on the P- (acutely toxic) and U- (toxic) lists. The P-listed, or acutely toxic, wastes are especially important because any school generating more than 1 kg (2.2 pounds or approx. one quart of liquid) of acutely hazardous waste per month will be subject to the most stringent generator requirements for listing, storing, and reporting all their hazardous waste. In our experience, most schools do not use many P-list chemicals. The exceptions, which Flinn Scientific currently sells and some schools may use, are listed below. Listed wastes refer specifically to discarded or unused commercial chemical products where the chemical is not mixed with anything else. Make sure your school has effective chemical purchasing, storage, and inventory controls in place if use any P-listed chemicals in your science labs. An accurate and up-to-date inventory is the most effective means of keeping track of chemicals and preventing the accumulation of unused chemicals that will require licensed hazardous waste disposal. Remember also that all hazardous chemicals must be always be stored in a locked chemical storeroom and that access to locked chemical storage areas must be restricted to trained personnel and strictly enforced.

P-Listed Chemicals Sold by Flinn Scientific

Ammonium Vanadate
Arsenic Trioxide
Epinephrine
Nicotine
Potassium Cyanide

Please consult the EPA Web site for a full description of all listed hazardous wastes.

<http://www.epa.gov/osw/hazard/wastetypes/listed.htm>