

AVMA



American Veterinary Medical Association

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RCRA Docket  
Environmental Protection Agency  
Mailcode: 2822T  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

**Docket ID No. EPA-HQ-RCRA-2007-0932 - Amendment to the  
Universal Waste Rule: Addition of Pharmaceuticals**

Dear Sir or Madam:

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863 and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, the AVMA is the recognized national voice for the veterinary profession. The association's more than 76,000 members comprise approximately 86% of U.S. veterinarians, all of whom are involved in a myriad of areas of veterinary medical practice including private, corporate, academic, industrial, governmental, military, and public health services.

The Environmental Protection Agency (EPA) is proposing to include within the "universal waste" system all pharmaceuticals that are hazardous wastes. Under this proposal, entities generating hazardous pharmaceutical wastes would have two options for managing them, depending on state rules. Facilities may choose to continue managing these hazardous wastes under the full subtitle C Resource Conservation and Recovery Act (RCRA) hazardous waste regulations (40 CFR parts 260 to 268 and 270), or they may opt to manage hazardous pharmaceutical wastes as "universal wastes" (40 CFR part 273).

The AVMA applauds the EPA's continued leadership in protecting our environment. We also appreciate the EPA's initiative to seek new ways in which handlers of pharmaceuticals may dispose of pharmaceutical waste in a manner that is safe for the public health, including the health of the environment. Specifically, while the veterinary profession is a minimal contributor of hazardous pharmaceutical waste due to practices such as tight inventory control and transfer of unused pharmaceuticals back to distributors, the AVMA appreciates the EPA's initiative to provide an additional option for disposal of hazardous pharmaceuticals, allowing the disposal of pharmaceutical waste under either EPA's "Universal Waste" regulations (if finalized) or under the current RCRA regulations.

The AVMA welcomes the opportunity to continue communicating with the EPA on this and other important environmental issues. Should you need any additional explanation of AVMA's comments, please feel free to contact Dr. Lynne White-Shim at 800-248-2862, ext. 6784 or at [lwhite@avma.org](mailto:lwhite@avma.org).

Respectfully,

W. Ron DeHaven, DVM, MBA  
Executive Vice President  
American Veterinary Medical Association