

PharmEcology received the following email from Lisa Lauer of the EPA on November 30, 2011

-----Original Message-----

From: Lauer.Lisa@epamail.epa.gov [mailto:Lauer.Lisa@epamail.epa.gov]

Sent: Wednesday, November 30, 2011 2:04 PM

To: Johnson, Teri

Subject: Fw: Phentermine HCL

Teri -

As requested, here is the original email regarding Phentermine HCL.

Also, please note that is the federal position. The authorized states can take a more stringent stance.

Please let me know if you have any other questions.

Regards -

Lisa

Lisa M. Lauer

U.S. Environmental Protection Agency

Materials Recovery and Waste Management Division Office of Resource Conservation and Recovery

1200 Pennsylvania Avenue NW Washington, DC 20460 Mail Code 5304P

Voice: 703-308-7418

Fax: 703-308-0514

Schedule: Mon - 10:00 AM to 2:00 PM (telework) Wed and Thurs - 6:30 AM to 3:00 PM

----- Forwarded by Lisa Lauer/DC/USEPA/US on 11/30/2011 01:57 PM -----

From: Lisa Lauer/DC/USEPA/US

To: "Carney, Tom" <TCarney@STERICYCLE.com>

Cc: Teena Wooten/DC/USEPA/US@EPA

Date: 10/06/2010 02:52 PM

Subject:Phentermine HCL

Hi Tom -

According to our listing expert:

Phentermine is listed in 261.33 under the name alpha,alpha-dimethylphenethylamine as P046, with a CAS number 122-09-8.

However, the listing does not include the term "and salts", so I would say that Phentermine HCL is not listed. This was the principle used for EPA's policy that epinephrine is listed as P042, but that the salts are not covered by the listing.

According to the original background documents, phentermine

(alpha,alpha-dimethylphenethylamine) was listed in 261.33 due to its acute toxicity towards humans. There was no indication that EPA intended to include any of the salts (e.g., the HCL salt) in the listing for phentermine.

Please let me know if you have any additional questions.

Lisa

Lisa M. Lauer
U.S. Environmental Protection Agency
Materials Recovery and Waste Management Division Office of Resource Conservation and Recovery
1200 Pennsylvania Avenue NW Washington, DC 20460 Mail Code 5304P
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Schedule: Mon and Wed - 6:30 - 3:00
Tues and Thurs - 6:00 - 8:00 AM

From: Teena Wooten/DC/USEPA/US
To: Lisa Lauer/DC/USEPA/US@EPA
Date: 10/04/2010 04:30 PM
Subject: Fw: Pharmaceutical Hazardous Waste Rule

Hi Lisa,

Would you please respond to Tom?

Thanks.

Teena Wooten
Office of Resource Conservation and Recovery Materials Recovery Waste Management Division
Recycling and Generator Branch
(703) 308-8751

----- Forwarded by Teena Wooten/DC/USEPA/US on 10/04/2010 04:29 PM -----

From: "Carney, Tom" <TCarney@STERICYCLE.com>
To: Teena Wooten/DC/USEPA/US@EPA
Date: 10/04/2010 04:10 PM
Subject: Pharmaceutical Hazardous Waste Rule

Teena,

It has been a while. I hope you are doing well.

I spoke with Mark from your office several months ago at a COSTHA conference about the pending proposal on including pharmaceuticals in the universal waste rule and was wondering if there is any update on when the final rule might come out.

Also, can you point me in the right direction to talk to someone about whether Phentermine HCL would be considered a p-listed waste. It appears to us from reading the regs that phentermine in it's pure form is p-listed, but phentermine HCL is not. We are seeking clarification for some of our clients.

Thank you.

Tom Carney
770.409.1500

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