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MEMORANDUM

FROM: Robb Boros, Compliance Coordinator

DATE: March 1, 2010

RE: Patterson Pouch-Plus Self-Indicating Sterilization Pouches - Toxicity Characteristic Leaching Procedures

The Environmental Protection Agency [EPA], through Federal Hazardous Waste Regulations, includes a toxicity characteristic that specifies any waste exhibiting a leachable contaminant level equal to or greater than acceptable levels is a hazardous waste. The EPA provides in 40 CFR 261.24(b) - Table 1: Maximum Concentration of Contaminants for the Toxicity Characteristic a list of chemicals and their respective toxicity thresholds. State and local hazardous waste regulations may list additional contaminants and/or impose more restrictive limits than those listed by the EPA. It is solely the responsibility of the waste generator [end user] to comply with all federal, state and local regulations.

EMSL Analytical, Inc., an independent environmental testing laboratory, has conducted Toxicity Characteristic Leaching Procedures [TCLP] for Barium on the Patterson Pouch-Plus self-indicating sterilization pouches listed herein. In each procedure, testing was conducted independently on both new samples and samples that had been subjected to normal steam-based sterilization.

Item	Dimensions (inches)	Qty	Barium (ppm)	
			New	Used
070842575	3.50 x 9.00	200	≤1.5	≤1.3
070842583	5.25 x 10.00	200	≤1.5	≤1.3
070842591	2.75 x 9.00	200	≤1.5	≤1.3
070842609	3.50 x 9.00	500	≤1.5	≤1.3
070842617	3.50 x 5.25	200	1.5	1.3
070842625	2.25 x 4.00	200	2.1	1.7
070842633	7.50 x 13.00	200	≤1.5	≤1.3

- The TCLP was conducted using the smallest pouches therefore subjecting the greatest concentration of indicator ink in relation to total pouch size to the testing. All pouches, other than 07084625, use the same printing plates as 070842617. Item 07084625 uses smaller printing plates than the other pouches and was tested independently.

These products do not contain lead.

The products listed herein meet the definition of an article as defined in 29 CFR 1910.1200(c) and are not subject to the MSDS requirements in 29 CFR 1910.1200. Please retain this document for your records.

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