

RCRA P-List & U-List Pharmaceuticals — Quick Reference

Commonly encountered P- (acute) and U- (toxic) listed drugs under 40 CFR 261.33, plus characteristic examples. Not exhaustive — always verify against the current CFR and the product SDS.

P-listed (acute hazardous)

Drug / substance	Code	Note
Warfarin ($\geq 0.3\%$)	P001	Below 0.3% is U248
Nicotine (& salts) — e.g., certain NRT	P075	OTC NRT has an EPA exemption under Subpart P
Physostigmine	P204	
Physostigmine salicylate	P188	
Epinephrine (base)	P042	EPA has clarified epinephrine SALTS are generally not P042
Arsenic trioxide	P012	Certain oncology use

U-listed (toxic) — examples

Drug / substance	Code	Note
Warfarin ($< 0.3\%$)	U248	At or above 0.3% is P001
Cyclophosphamide	U058	Chemo agent
Chlorambucil	U035	Chemo agent
Melphalan	U150	Chemo agent
Daunomycin	U059	Chemo agent
Mitomycin C	U010	Chemo agent
Lindane	U129	
Selenium sulfide	U205	Certain dermatologic products

Characteristic (D-code) reminders

A drug can be hazardous by characteristic even if unlisted: ignitability (D001) for high-alcohol elixirs and aerosols, corrosivity (D002), reactivity (D003), and toxicity (D004–D043) for certain heavy-metal or listed constituents. Empty containers and residues of P-listed drugs can retain the designation. Under EPA Subpart P (40 CFR 266), hazardous waste pharmaceuticals cannot be sewered.