



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Hazardous & Radioactive Materials Bureau  
2044 Galisteo  
P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-1557  
Fax (505) 827-1544



MARK E. WEIDLER  
SECRETARY

EDGAR T. THORNTON, III  
DEPUTY SECRETARY

April 17, 1996

Robert W. Burrell, Chief  
DRMO Kirtland  
5050 Randolph Avenue  
Kirtland AFB, NM 87117-5856

Dear Mr. Burrell:

This is in response to your April 5, 1996 letter concerning the regulatory status of recycled silver. The Hazardous and Radioactive Materials Bureau (HRMB) concurs with the regulatory approach DRMS is currently taking in its management of the Precious Materials Recovery Program. Specifically, DRMS must manage used photographic fixer exhibiting the toxicity characteristic as a hazardous waste prior to reclamation. However, the reclamation process itself is exempt and the recovered silver can be managed as a usable product.

Thank you for your inquiry. If you have any questions concerning this matter, please contact me at (505) 827-1558.

Sincerely,

A handwritten signature in cursive script that reads "Coby Muckelroy".

Coby Muckelroy  
RCRA Inspection/Enforcement Program Manager  
Hazardous and Radioactive Materials Bureau

KAFB1755

