

AUGUST 12, 1987

MEMORANDUM

SUBJECT: Waste Characterization: Lithium Batteries

FROM: Matthew Straus, Chief
Waste Characterization Branch (WH562B)

TO: David M. Friedman, Chemist
RCRA Support Section (3HW34)
EPA Region III

This is in response to your memo of July 8, 1987, in which you requested an opinion on the hazardousness of lithium batteries. Based on the material you provided, we cannot determine whether or not these batteries would meet the reactivity characteristic. Rather, American Meter Company, as the waste generator, must make a determination themselves under 40 CFR §261.23.

However, I have attached a letter from EPA to the Defense Logistics Agency concerning lithium-sulfur dioxide (Li/SO₂) batteries. Based on available information, we concluded that Li/SO₂ batteries exhibit reactivity. This conclusion does not necessarily extend to other types of lithium batteries. (See "footnote 1" in the letter.) However, to the extent that American Meter's batteries have properties similar to those described in the attached letter, their batteries may well be hazardous waste.

Please feel free to give me a call if you have any further questions.

Attachment

FaxBack# 11274