

9443.1983(05)

WASTE BATTERIES AND CELLS

JUL 27 1983

RE: WCNBA3408

Mr. Leroy J. Wilder, Jr.
Ray-O-Vac
630 Forward Drive
Madison, WI 53711

Dear Mr. Wilder:

I am writing in response to your July 14, 1983 request for clarification of the Resource Conservation and Recovery Act (RCRA) hazardous waste identification regulations as they apply to waste batteries and cells.

As we discussed in our telephone conversation on July 7, 1983, most common batteries and cells rapidly degrade when placed in a landfill. Thus, when testing such products to determine if they exhibit the Extraction Procedure Toxicity characteristic (40 CFR 261.24) the batteries and cells should be cut up into small pieces (i.e., to pass 1 cm sieve). If, after such preparation, none of the concentrations listed in 40 CFR 261.24 Table 1 are exceeded the batteries are not hazardous wastes and may be disposed of in a sanitary landfill. Batteries that yield extracts exceeding one or more thresholds are hazardous wastes and must be disposed of in a RCRA permitted facility.

Certain batteries and cells, however, are manufactured in such a manner as to prevent disintegration after disposal. Such products may be tested without being cut up. At this time, we have not developed testing thresholds for identifying such abuse resistant products. Pending development of such tests you may evaluate the corrosion resistance of your products using a salt water solution. If after submersion for 1 month in a salt water solution no leakage occurs, the product can be considered to be corrosion resistant. If the package is also structurally resistant to crushing, it can be evaluated in the EP Toxicity test without being cut up.

I trust that this explanation assists you in evaluating your wastes. I would like to also bring to your attention the fact that we have a toll free hotline (1-800-424-9346), if you ever need assistance with any aspect of the RCRA regulations.

Sincerely yours,

David Friedman
Manager
Waste Analysis Program

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