



**Energizer**

Eveready Battery Company, Inc.  
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## **DISPOSAL OF *Energizer*** **NICKEL METAL HYDRIDE BATTERIES**

*Energizer* Nickel Metal Hydride (NiMeH) batteries are United States Resource Conservation and Recovery Act (RCRA) non-hazardous waste.

Waste NiMeH batteries meet the United States Federal definition of a solid waste per 40 Code of Federal Regulations (CFR) 261.2. As such, the generator must make certain determinations relative to the waste material. Waste NiMeH batteries do not fall under any of the specific United States Federal RCRA F, K, P, or U lists, nor do any states specifically regulate this type of waste, to our knowledge.

This leads us to the RCRA characteristic waste criteria. Toxicity Characteristic Leaching Procedure (TCLP) listed materials are not used as battery components and may only be present in trace quantities in the steel can as part of the steel alloy or as a trace contaminant in battery electrode material. Based on our knowledge of the battery and battery raw materials, waste NiMeH batteries are not RCRA toxic. Only the characteristics of ignitability, corrosivity, and reactivity remain as possible classifications.

The batteries are solid, not liquid, which precludes their being a corrosive waste, since corrosive waste must be liquid by definition. As an inert solid, flash point is not an appropriate test for ignitability. Our batteries are a safe consumer product and, under standard temperature and pressure conditions, will not cause fire through friction, absorption of moisture, or spontaneous chemical changes. These batteries contain no sulfides or cyanides, and they do not meet any other reactivity criteria.

United States Federal hazardous waste regulations are specific about relating waste determination to the waste **as generated**. As generated, scrap NiMeH batteries are not a specifically listed waste stream and they do not meet the criteria for ignitable, corrosive, reactive or toxic wastes. Scrap NiMeH batteries are not hazardous waste and they are not regulated by the United States Department of Transportation (DOT) as hazardous materials.

Other nations and some US states may regulate waste based on additional criteria or different test protocols. The status of scrap nickel metal hydride batteries should be confirmed in the nation or US state(s) where disposal occurs.

***Energizer***  
**January, 2002**

This document is advisory in nature and is intended to provide battery disposal guidance based on current United States federal laws and regulations. The information and conclusions set forth herein are made in good faith and are believed to be accurate as of the date of preparation. However, by United States law, waste disposal determinations are ultimately the responsibility of the generator.