Eveready Battery Company, Inc.
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DISPOSAL OF *Eveready/Energizer* CARBON ZINC AND STANDARD ALKALINE BATTERIES

Energizer carbon zinc and standard alkaline batteries are United States Resource Conservation and Recovery Act (RCRA) non-hazardous waste.

Waste carbon zinc and standard alkaline 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 carbon zinc and standard alkaline batteries do not fall under any of the specific United States Federal RCRA F, K, P or U lists.

This leads us to the RCRA characteristic waste criteria. Some Toxicity Characteristic Leaching Procedure (TCLP) listed materials may be present in minute quantities in the raw materials, but are well below the established regulatory maximum values. Waste carbon zinc and standard alkaline 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. The 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 carbon zinc and standard alkaline batteries are not a specifically listed waste stream and they do not meet the criteria for ignitable, corrosive, reactive or toxic wastes. Scrap carbon zinc and standard alkaline 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 carbon zinc and standard alkaline 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.