DISPOSAL OF USED BATTERIES

The purpose of this section is to provide some help in dealing with the concerns of “used battery” disposal. We make no attempt to address the legal or technical aspects of the problem. We wish only to point out some of the areas of concern and to suggest your own legal and environmental groups within your own company provide the guidance needed to comply with present and future EPA and local regulations.

It is our understanding that all batteries which have been declared or documented as “scrap”, “failed”, “waste”, “spent” or any designation suggesting they are no longer “usable batteries”, are by EPA regulation considered “hazardous waste” and must be dealt with accordingly. This means the product so designated, could only be moved by a licensed hazardous waste transporter and then only to an EPA approved (licensed) hazardous waste recycling facility. It is, further, our understanding that if the “failed” product is turned over to an EPA approved recycler, the EPA and/or local environmental agencies have seven (7) years in which they could tighten their requirements or controls and the recycler would have to go back and clean up his waste, etc., for the past seven years. If the recycler complied with this requirement, all would be well and good. If, however, he was unable or unwilling to comply with the new requirements, the superfund could step in and perform the task and pass their clean up charges on to the original companies who had turned the “failed” product to the recycling company.

It appears then, that for large corporations (potentially deep pockets), you not only need to be concerned that your recycler is approved and meeting all current requirements, but is financially strong enough and sufficiently committed to maintain compliance with all future requirements.

Please contact us for specific instructions regarding disposal of Lead Acid or Nickel Cadmium Batteries per EPA regulations.

Again, we must emphasize that if the battery has already been documented as a “failed” battery, it can only be transported by a “licensed hazardous waste transporter”.

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