



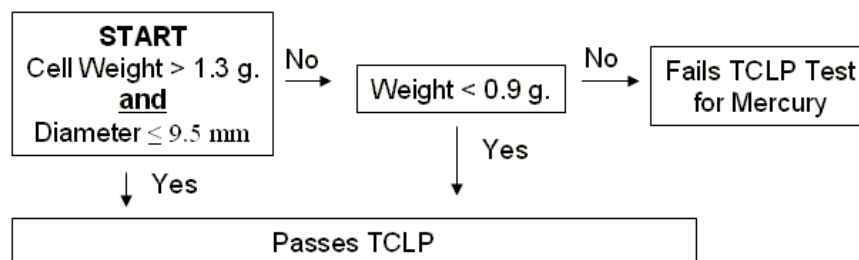
DISPOSAL OF Eveready/Energizer Silver Oxide Button Cell Batteries

Waste silver oxide batteries meet the United States Federal definition of a solid waste per Title 40 Code of Federal Regulations (CFR) Part 261.2. As such, the generator must make certain determinations relative to the waste material. Waste silver oxide batteries do not fall under any of the specific United States Federal RCRA F, K, P or U lists.

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 silver oxide batteries are not a specifically listed waste stream and they do not meet the criteria for ignitable, corrosive, or reactive wastes.

This leads us to the RCRA toxicity characteristic waste criteria. The size of the battery is important in determining the classification of the waste. The larger silver oxide batteries may fail the TCLP test for mercury. The smaller cells pass the TCLP test. The following diagram can be used to determine if a silver oxide battery will pass the TCLP test. Batteries that pass the TCLP test can be disposed of as RCRA non-hazardous waste and batteries that fail the test must be managed as hazardous waste.



Batteries failing the TCLP test that are otherwise managed by the waste generator in accordance with Universal Waste Rule requirements at 40 CFR Part 273 are not considered to be hazardous waste.

Other nations and some U.S. states may regulate waste based on additional criteria or different test protocols. The status of waste silver oxide batteries should be confirmed in the nation or U.S. state(s) where disposal occurs.

Energizer
May, 2009

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.