

<u>SUBJECT</u>		<u>DATE</u>
1448.	Definitions of Inactive Portion, Active Portion and Closed Portion of a RCRA TSDF	AUG 12, 2021
1449.	Dangerous Waste Designations and Dangerous Waste Code Determinations	AUG 19, 2021
1450.	Method Detection Limits and Hazardous Waste Determinations	ENCORE AUG 26, 2021
1451.	Method Detection Limits and Hazardous Waste Determinations II	ENCORE SEP 2, 2021
1452.	Totals Analysis vs. TCLP and Dividing by 20	ENCORE SEP 9, 2021
1453.	Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE SEP 16, 2021
1454.	Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE SEP 23, 2021
1455.	Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE SEP 30, 2021
1456.	The "Derived from Rule", the "Mixtures Rule", and the "Contained-In Policy"	ENCORE OCT 7, 2021
1457.	Hazardous Debris and Options to Exclude as a Dangerous Waste	OCT 14, 2021
1458.	Regulatory Status of Characteristic Baghouse Dust Destined for Reclamation	OCT 21, 2021
1459.	RCRA Point of Generation and Baghouse Dust Collection Systems	OCT 28, 2021
1460.	Pumps Containing Liquid Hazardous Wastes and Liquids in Landfill Prohibition	ENCORE NOV 4, 2021
1461.	Pumps Containing Liquid Hazardous Waste and Land Disposal Restrictions	ENCORE NOV 11, 2021
1462.	Pumps Containing Liquid Hazardous Wastes and RCRA Empty Containers	NOV 18, 2021
1463.	Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents	ENCORE NOV 23, 2021
1464.	LDR Notifications/Certifications and Generator Permitted Treatment, Storage, or Disposal Facility	ENCORE DEC 2, 2021
1465.	Multiple Characteristic and Listed Hazardous Waste Codes and the "in lieu of" LDR Principle	ENCORE DEC 9, 2021
1466.	Universal Wastes - Recycling versus Disposal	ENCORE DEC 16, 2021
1467.	'Twas the Night Before Christmas – The Twenty-Eighth Edition	DEC 24, 2021
1468.	Spent Lead Acid Batteries vs., Universal Wastes	ENCORE DEC 30, 2021

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## TWO MINUTE TRAINING

**TO:** CENTRAL PLATEAU CLEANUP COMPANY

**FROM:** PAUL W. MARTIN, RCRA Subject Matter Expert  
CPCCo Environmental Protection, Hanford, WA

**SUBJECT:** SPENT LEAD ACID BATTERIES VS., UNIVERSAL WASTES

**DATE:** DECEMBER 30, 2021

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## TWO MINUTE TRAINING

**SUBJECT:** Spent Lead-Acid Batteries vs. Universal Wastes

**Q:** Concerning the recycling of spent lead-acid batteries and the universal waste regulations at [40 CFR Part 273](#), why did EPA retain [40 CFR Part 266, Subpart G](#), “Spent Lead-Acid Batteries Being Reclaimed” even though spent lead-acid batteries can be reclaimed as universal wastes?

**A:** Per an EPA RCRA Hotline report ([RO 13772](#)) dated December 1995:

*“Lead-acid batteries that are managed under Part 266, Subpart G, are not subject to the universal waste management standards. The universal management standards only apply to those lead-acid batteries that are not managed under Part 266, Subpart G. The existing recycling program for automotive lead-acid batteries has been extremely successful, with recycling rates in excess of 90 percent nationwide. By retaining the Part 266, Subpart G, requirements, EPA can continue to operate this program without modification or adverse effect on the environment. EPA expects that most non-automotive lead-acid batteries will be managed under Part 273 ([60 FR 25492, 25505; May 11, 1995](#))”*

Since the recycling of spent lead-acid batteries under the existing 40 CFR 266, Subpart G rules [[WAC 173-303-520](#)] had been so EPA did not want to hamper the battery recycling process by replacing 40 CFR Part 266, Subpart G with the new universal waste rules at 40 CFR Part 273 [[WAC 173-303-573](#)].

### SUMMARY:

- Spent lead-acid batteries can be recycled per 40 CFR Part 266, Subpart G or 40 CFR 273.
- The existing recycling program under 40 CFR 266, Subpart G has been very successful.
- EPA saw no need to change a good thing.

Nothing is attached to the e-mail. If you have any questions, contact me at "[Paul W Martin@rl.gov](mailto:Paul_W_Martin@rl.gov)" or at (509) 376-6620.