

JEA Westside SC  
FD 981027279  
Eulvel

## Fellabaum, Pamela

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**From:** Fellabaum, Pamela  
**Sent:** Friday, September 21, 2012 2:00 PM  
**To:** 'Yales, Ronald J.'  
**Subject:** RE: Ruling

Hi Ron,

Based on my review of the MSDS that you sent and the Universal Waste (UW) regulations, I think that the batteries should be managed as Universal Waste. Sending the batteries off-site for recycling as Universal Waste seems to be the best way to manage the batteries. While they are on-site, they would need to be segregated by type and collected in a container. The container should be kept closed and labeled with words like "Universal Waste – Batteries." The container should be dated or you need to keep an inventory to show that the batteries are kept for less than one year. UW regs may be found in 40 CFR 273.

Please let me know if you have any additional questions.

Pam

### Pamela Fellabaum, CHMM

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For more information, please visit these Websites:

[http://approd.dep.state.fl.us/www\\_rcra/reports/handler\\_sel.asp](http://approd.dep.state.fl.us/www_rcra/reports/handler_sel.asp)

<http://www.dep.state.fl.us/northeast/waste/default.htm>

[http://www.dep.state.fl.us/waste/quick\\_topics/publications/default.htm](http://www.dep.state.fl.us/waste/quick_topics/publications/default.htm)

<http://dwmedms.dep.state.fl.us/Oculus/servlet/login>

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**From:** Yales, Ronald J. [<mailto:yalerj@jea.com>]  
**Sent:** Monday, September 10, 2012 8:47 AM  
**To:** Fellabaum, Pamela  
**Subject:** Ruling

Mrs. Fellabaum,

Thank you for speaking with me last Friday. We are seeking a ruling from EPA, on the proper disposal and or recycling of the Tadiran lithium inorganic size D batteries. These batteries are completely sealed in resin as you can see in the pictures attached. I also have attached the MSDS for these batteries for you as requested.

Should you require additional information, please feel free to contact me.

Best Regards,  
Ron

*Ron Yales*  
*JEA*  
*Investment Recovery*  
*Working Foreman*  
*6727 Broadway Ave*  
*Jacksonville Fl 32254*  
*Office 904-665-8413*  
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