



1-Oct-2018

RE: Recycling of Lead-Acid Batteries at Exide Technologies

To Whom It May Concern:

Exide Technologies (Exide) is a world leader in stored electrical energy and is one of the world's largest recyclers of spent lead-acid batteries and other lead containing materials. Exide takes great pride in the service that we provide for the environment by responsibly recycling lead containing material and spent lead-acid batteries or by refurbishing a small amount of automotive spent lead-acid batteries for re-sale.

When your lead acid battery or lead containing material is returned to Exide, it is either recycled at one of our own U.S. Environmental Protection Agency (EPA) approved recycling facilities or an Exide-approved and fully-licensed recycling partner. Exide takes great care to only partner with those recycling vendors who either meet or exceed the applicable Environmental, Health, and Safety (EHS), as well as the Department of Transportation (DOT), regulatory standards.

When a returned automotive battery can be refurbished for reuse, labeled as such and resold, the waste products of the recycling process are not generated. Whether lead-acid batteries are refurbished or recycled, all batteries that are transported, from the time that they are picked up to the time that they are either recycled or refurbished, are managed by following all applicable U.S. DOT regulations for transporting spent lead-acid batteries.

For those batteries that are recycled, recycling is done in a manner that ensures compliance with federal hazardous waste regulations and state recycling laws. Each of our recycling facilities, as well as each facility of our approved recycling partners currently operates under a U.S. EPA's Resource Conservation and Recovery Act (RCRA) Part B Hazardous Waste Permit or equivalent requirements. Those spent lead-acid batteries and other lead containing compounds are recycled at one of the following EPA approved recycling facilities:

<u>Location</u>	<u>U.S. EPA ID Number</u>
Forrest City, MO	MOD030712822
Muncie, IN	IND000717959
Vernon, CA	CAD097854541
Reading, PA	PAD990753089
Central Recycling Partner	MOD059200089
Southeast Recycling Partner	ALD046481032
Anaheim, CA Recycling Partner	CAD088504881
Boss, MO Recycling Partner	MOD059200089
City of Industry, CA Recycling Partner	CAD066233966
Egan, MN Recycling Partner	MND006148092
Florence, SC Recycling Partner	SCR000771451
Indianapolis, IN Recycling Partner	IND000199653

Jones, OK Recycling Partner	OKD032963530
Lancaster, OH Recycling Partner	OHD071654958
Laredo, TX Recycling Partner	TXR000080383
McAllen, TX Recycling Partner	ALR000047167
Middletown, NY Recycling Partner	NYD030485288
Tampa, FL Recycling Partner	FL0004092839
Troy, AL Recycling Partner	ALD046481032

Lead-acid batteries received at one of these facilities are shredded or otherwise disassembled and the lead, casing, and acid fractions are separated. Shredded polypropylene battery casings are washed, sized, and classified and extruded to form polypropylene pellets used to manufacture new battery cases. The waste sulfuric acid is converted to sodium sulfate (a marketable material), reused on a limited basis, or neutralized and discharged under appropriate limits. The secondary lead is recovered in furnaces and reused to make lead-acid batteries or used as a raw material for other lead containing products. Exide's vertically integrated Total Battery Management (TBM) program is designed to provide the best possible management option for your spent lead-acid batteries.

Under the Superfund Recycling Equity Act of 1999 (SREA), the generator of spent lead-acid batteries can receive environmental liability protection for recycled lead-acid batteries. SREA outlines the criteria necessary for a generator to be eligible for the recycling exemption, which includes a requirement that the generator use "reasonable care" to ensure the facility that handles, reclaims, or processes the recycled batteries is in compliance with applicable environmental regulations. This letter is provided to assist you in demonstrating compliance with SREA. To that end, Exide states the following:

1. That spent lead-acid batteries and other lead containing materials sent to secondary lead smelters owned and operated by Exide or one of Exide's approved recycling partners are either recycled or refurbished.
2. That spent lead-acid batteries and other lead containing materials sent to either Exide's secondary lead smelters or Exide's approved recycling partners are not burned as fuel, used for energy recovery, or incinerated.
3. That a market exists for spent lead-acid batteries.
4. That a substantial portion of the recycled lead-acid batteries are made available for use as feedstock for the manufacture of a new saleable product, namely new lead-acid batteries.
5. That recyclable material from the lead-acid batteries can be a replacement or substitute for a virgin raw material, and the product made from the recyclable material can be a replacement or substitute for a product made, in whole or in part, from a virgin raw material.
6. That the secondary lead smelters owned and operated by Exide or Exide's approved recycling partners are in compliance with the substantive (as the term is defined in the Superfund Recycling Equity Act, Public Law Number 106-113, 113 Stat. 1501A-599, codified at 42 U.S.C. § 9627) provisions of any federal, state, or local environmental law or regulation, or compliance order or decree issued pursuant thereto, applicable to the handling, processing, reclamation, storage, or other management activities associated with spent lead-acid batteries and other lead containing materials.

In addition to the SREA provisions, federal regulations provide streamlined management standards for spent lead-acid batteries. Generators of spent lead-acid batteries are required to follow the management standards for spent lead-acid batteries that are reclaimed (40 C.F.R. Part 266, Subpart G) or the universal waste standards for spent lead-acid batteries (40 C.F.R. Part 273). To ensure the proper management of lead-acid batteries, we recommend that you verify that your company is following all applicable requirements for spent batteries.

If you should have questions or concerns on how Exide handles your spent lead-acid battery or other lead containing materials in an environmentally responsible way, please do not hesitate to contact me. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Charles E. Osborne".

Ed Osborne, CSP
Vice President, Environment, Health & Safety
Exide Technologies

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