

November 29, 2011

Frequently Asked Questions Stacking and Wrapping Used Batteries on Pallets

The United States Department of Transportation has increased its enforcement activity regarding the packaging and shipping of spent lead acid batteries. In the past, this activity has been focused on the transporter. Now the DOT is also extending that same focus to the originator (those companies returning the scrap) of the shipment. We have developed this document and the "Stacking and Wrapping Used Batteries on Pallets" EPM Form No. 1504 03/10 to assist you or your company in compliance efforts.

1. *What are the most common issues associated with the transportation of used batteries?*

The DOT has been stopping trucks carrying batteries and can fine both the transporter and the originator/shipper for non-compliance. It is important that your organization follows the techniques outlined in the "Stacking and Wrapping Used Batteries on Pallets" to avoid potential non-compliance, penalties, and interrupted transport. The most frequently cited issues are:

- Improper blocking and bracing of the load
- Ensuring that the product is upright and secure to the pallet
- Batteries loose and not properly secured
- Batteries configured so that there is no terminal contact
- Leaking batteries (prohibited)
- Accuracy of the paperwork, hazard class, placard (as necessary)

2. *Can the large plastic bag that is the size of the pallet with a cardboard sleeve be used to transport batteries between locations on my trucks?*

Yes. However, batteries need to be stabilized on a pallet at all times. They cannot shift or move during transport. The stacking and wrapping instructions must be followed as shown on the "Stacking and Wrapping Used Batteries on Pallets" EPM Form No. 1504 (Rev. 03/10).

3. *I pick-up used batteries with my own delivery vehicles? Can I continue to transport batteries using this method?*

Yes, as long as the total battery weight is 1,000 pounds or less and there is no other hazardous materials loaded on the vehicle. All batteries need to be stable, secure, and cannot leak. If the total aggregate weight of all hazardous material exceeds 1,000 pounds, the load is now subject to the requirements of the Code of Federal Regulations 49, parts 100 to 185.

4. **The poster states that only batteries that are damaged, but NOT visibly leaking are to be put in a heavyweight bag. If a battery is visibly leaking acid, what is the proper method for handling?**

SAFETY PRECAUTIONS:

Review Material Safety Data Sheet (MSDS) for the selection and use of proper Personal Protective Equipment (PPE) such as acid resistant gloves, face shield and/or chemical resistant apron. Avoid direct contact with the spilled electrolyte, the neutralizing agent (such as soda ash) and the blend/mixture of electrolyte and agent. In the event of physical contact, flush the contacted area with water for 15 minutes. See the MSDS for additional Medical/First Aid information

SAFETY INFORMATION:

- A. Proper handling techniques & responsible care for spent batteries are essential in minimizing the potential for damaged batteries and accidental spills of sulfuric acid. Customer's employees shall understand the information presented in the following reference documents:
Material Safety Data Sheet (MSDS) for Lead Acid Battery Wet, filled with Acid Stacking and Wrapping Used Batteries on Pallets
- B. As stated in prior customer communications, a lead acid battery that is leaking electrolyte (sulfuric acid) is prohibited for shipment by the DOT. If a battery is damaged resulting in the release of electrolyte (sulfuric acid), the key is to clean up the spill/release immediately.
- C. It is important that any spill/release of sulfuric acid be reported to your Environmental Department so it can provide guidance for the clean up based on your company's practices, procedures and applicable State/Local/Federal regulations.

INSTRUCTIONS FOR BATTERY ACID LEAK CONTAINMENT:

One possible approach that may be considered to respond to electrolyte (sulfuric acid) spill/release is as follows:

1. Immediately contain the spill/release.
2. Immediately clean up the spilled electrolyte.
3. Initially respond to spill by adding a neutralizing agent, such as soda ash, to soak-up/neutralize the spilled acid. Slowly add the soda ash to the spill, mixing the material into a paste. Continue to add the soda ash until all the liquid is absorbed into the mixture.
4. The mixture of soda ash and electrolyte will form a solid, paste like material.
5. Test the mixture/material with pH paper to ensure the material is neutral. Add additional soda ash if necessary to establish a neutral mixture.
6. Collect the mixture/material, making sure that there is no liquid residue present, and place it into a heavyweight polyethylene plastic bag (minimum 6 mil) with the damaged battery.
7. Make sure that the battery is no longer leaking before placing into the bag. Note: there should be no liquid present in the bag.
8. Seal the bag.
9. Follow the Stacking and Wrapping Used Batteries on Pallets guidance document for additional information related to shipment preparation.

WHO TO CONTACT:

The possible approach described above as to how to respond to a spill is offered for your guidance. Your Environmental Department may require alternative or additional measures on how to respond to a spill. Therefore, in the event of a spill, it is critical that your employees immediately notify your Environmental Department and comply with all instructions given by the Environmental Department.

Should you have any immediate questions regarding this topic, please contact your East Penn sales representative or East Penn customer service.

5. *Can I purchase the supplies as noted from on the “Stacking and Wrapping Used Batteries on Pallets” EPM Form No. 1504 (Rev. 03/10)?*

East Penn encourages, when possible, that the customer reuses the cardboard, waffle board, and pallet that are provided with new battery shipments. If additional materials are needed, these supplies are available to purchase through East Penn. Please contact your sales person or customer service.

SHIPPING SUPPLIES INFORMATION AND PRICING:

<u>PART NUMBER</u>	<u>DESCRIPTION</u>
HYCB001	1” honeycomb (1 piece)
CTN100	flat cardboard (1 piece)
BAG-A12	automotive battery plastic bags (12 bags per pack)
BAG-C1	commercial battery plastic bag (1 bag)

6. *If I ship used batteries through an independent carrier, am I still liable for the battery delivery?*

The DOT regulations are directed toward both the shipper and/or carrier. The federal, state, and local authorities have the discretionary authority to cite violations and assess fines to both the shipper and/or carrier for failure to comply with the prescribed regulations. The “Stacking and Wrapping Used Batteries on Pallets” EPM Form No. 1504 (Rev. 03/10) was developed to provide guidance as a means to comply with the DOT regulations and to minimize the potential risk, exposure, and associated liabilities of non-compliance. These liabilities are not transferable and require the collaborate effort of all parties to achieve regulatory compliance.