

US EPA ARCHIVE DOCUMENT

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This checklist is intended for non-crushed, spent lead-acid batteries (SLABs) with intact casings. Crushed SLABs, SLABs that were drained of acid by cracking the casings, or separated SLAB components being exported for recovery of lead and other materials are not considered here since they do not qualify for the special management standards of either the SLAB regulations in 40 CFR part 266 subpart G, or the Universal Waste regulations in 40 CFR part 273. Instead, such shipments could potentially be subject to RCRA manifest and other RCRA requirements for hazardous waste depending on the results of a hazardous waste determination.

THERE IS NO OFFICIAL U.S. EXPORT NOTICE FORM. To assist applicants, the table below identifies the items that an exporter must submit as part of the notification of intent to export required in 40 CFR 262.53. You may copy and follow the table format below, use the format that is most convenient for your records, or use the form that is preferred by the Country of Import. All listed items, unless noted as “not required,” must be included in order for the submitted notification to be considered complete by EPA.

You must submit your completed notification to EPA at least 60 days before you intend to send the first SLAB shipment off site (40 CFR 262.53). There is no guarantee that consent can be obtained within this period, so additional advance notice is recommended. Notices may be submitted using the following methods.

Courier or hand delivery: ATTN: Notification of Intent to Export
Office of Enforcement and Compliance Assurance,
Office of Federal Activities,
International Compliance Assurance Division
Environmental Protection Agency
Ariel Rios Building, Room 6144
12th St. and Pennsylvania Ave., NW

Washington, DC 20004

Fax:

ATTN: Notification of Intent to Export

Fax notice to 202-564-0025, original notice with signature must follow by mail.

Data Item Required in Notice (see §262.53)	Guidance on Data Item
SLAB exporter: Name	Exporter is anyone arranging for shipment of the SLABs overseas – may be original SLAB collector, or company that physically picks up and manages SLABs from many smaller collection points, or even someone who buys the SLABs through the internet and arranges for shipment overseas. See important explanation of exporter obligations at the end of this checklist.
SLAB exporter: Mailing address (street, city, state, zip code)	See above.
SLAB exporter: Telephone number	See above.
SLAB exporter: Email address (Not required under regulations)	Include if you would like EPA to use to contact you in case data on notice needs clarification.
SLAB exporter: EPA ID number	Must list if you have one. A broker arranging for export without physically possessing the SLABs may not have one, in which case the broker may list EPA ID number of client associated with the export (e.g., generator, transporter, or permitted facility storing the SLABs) for whom you are preparing the export notification.
SLAB exporter: Signature	Must include original signature of exporter.
Foreign Destination Facility (aka Consignee) for SLABs: Name	Where the SLABs will be recycled.
Foreign Destination Facility for SLABs: Site Address	See above.
Foreign Alternate Destination Facility Name and Address (not required to have one)	If have alternate site listed, subsequent consent automatically would cover shipments to the alternate location if SLABs could not be managed at main destination facility for whatever reason.
Hazardous Waste to be Exported: Description	Spent lead-acid batteries, whole. Indicate whether or not drained of acid, and whether or not “non-spillable.” See important explanation on proper identification of SLABs at the end of this checklist.
Hazardous Waste to be Exported: RCRA Waste Codes	Most likely entries include: D008, D002 (list all that apply)
Hazardous Waste to be Exported: DOT Proper Shipping Name	Most likely entries include: “waste batteries, wet, filled with acid” “waste batteries, wet, non-spillable”

Data Item Required in Notice (see §262.53)	Guidance on Data Item
Hazardous Waste to be Exported: DOT Hazard Class	Most likely entry include: Class 8 or Class 9 (use only one)
Hazardous Waste to be Exported: DOT ID Number (UN/NA)	Most likely entries include: UN2794 (if “batteries, wet, filled with acid”). UN2800 (if “batteries, wet, non-spillable”).
Requested Period of Export	Either list desired Start and End Dates to cover when you would like to ship SLABs, or list number of months you would like to export (up to 12 months is allowed).
Estimated Frequency or Rate of Shipments	List maximum number of shipments you think would occur per month or week, and/or total number of shipments you expect to make over the entire period of export.
Expected Mode of Transportation Vehicle	Narratively list all that apply in expected order of use during transport. Possible entries include: Air, highway/truck, rail/train, water/ship.
Expected Container Types SLABs will be packed in	Narratively describe all packaging to be used. Possible entries include: drums, boxes, overseas shipping containers. Packaging must comply with DOT packaging requirements.
Maximum Export Quantity of SLABs	List total weight of SLABs you expect to export during period of export.
Units for Maximum Export Quantity Listed	List units for weight listed above, most likely entries include: pounds (P) kilograms (K) U.S. tons (T, equal to 2000 pounds) Metric Tons (M, equal to 1000 kilograms)
Expected Waste Management	Narratively describe the manner in which the SLABs will be treated at the foreign destination facility. Possible entries include: recycling, recovery of lead.
Transit Countries: Names, expected length of stay, and expected handling while there	List any country your shipment will cross or spend time in port while being transported to the final destination facility, roughly how long the shipment will spend at the port or inside each listed country, and its expected method of handling while in each listed country.
Points of Entry and Exit for every foreign country listed on notice	List each country, and for each list the expected port of entry and port of exit (if a transit country). If shipment might use more than one port of entry or exit for a given country, list all ports that could be used.

Exporter Obligations

When multiple parties involved in an export of hazardous waste can meet the definition of an exporter, EPA requires that only one party perform the exporter duties under 40 CFR part 262 subpart E (e.g., notices, annual reports, recordkeeping) to avoid duplicative submissions. But all parties still have the responsibility to ensure that the exporter duties are met. If a problem arises with an export, EPA has the authority to enforce the RCRA export regulations against all parties associated with that export who meet the definition of an exporter. To avoid noncompliance with RCRA regulations, we recommend parties to export transactions assign and document these exporter responsibilities among themselves to ensure that the exporter duties are met.

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Proper Identification of SLABs

The following guidance is provided to help the exporter describe the “most likely” or “possible” entries for describing non-crushed, spent lead-acid batteries (SLABs) with intact casings.

Description. Should indicate whether or not the SLABs have been drained of acid, and whether or not the SLABs meet the DOT definition of “non-spillable” (must meet specific DOT criteria).

RCRA Waste Code. You should list all codes that apply to the SLABs you intend to export, which would typically be D008 (i.e., characteristically hazardous for lead) and D002 (e.g., characteristically hazardous for corrosivity) if any or all of the SLABs will contain acid. If all of the SLABs will be drained of acid and no longer contain any free flowing corrosive liquid (see definition of corrosive at [40 CFR 261.22](#)), then D002 would not apply.

DOT Shipping Name, ID Number, Hazard Class and Packing Group. DOT shipping names, ID numbers, hazard classes and packing group entries are listed for individual materials in the “Hazardous Materials Table” at [49 CFR 172.101](#). The text “waste” was added to each likely shipping name per the instructions in §172.101(c)(9). Shipping names are linked to the DOT ID Numbers (UN/NA numbers), hazard classes, and packing groups (PG numbers). The most likely classifications for intact SLABs would be “waste batteries, wet, filled with acid” (UN2794, class 8, PG III), or “waste batteries, wet, non-spillable” (UN2800, class 8, PG III). According to [49 CFR 173.159\(f\)](#), batteries may be considered “non-spillable” if they are capable of withstanding the following two tests, without leakage of battery fluid from the battery:

- (1) Vibration test. The battery must be rigidly clamped to the platform of a vibration machine, and a simple harmonic motion having an amplitude of 0.8 mm (0.03 inches) with a 1.6 mm (0.063 inches) maximum total excursion must be applied. The frequency must be varied at the rate of 1 Hz/min between the limits of 10 Hz to 55 Hz. The entire range of frequencies and return must be traversed in 95 ± 5 minutes for each mounting position (direction of vibrator) of the battery. The battery must be tested in three mutually perpendicular positions (to include testing with fill openings and vents, if any, in an inverted position) for equal time periods.

(2) Pressure differential test. Following the vibration test, the battery must be stored for six hours at $24\text{ }^{\circ}\text{C} \pm 4\text{ }^{\circ}\text{C}$ ($75\text{ }^{\circ}\text{F} \pm 7\text{ }^{\circ}\text{F}$) while subjected to a pressure differential of at least 88 kPa (13 psig). The battery must be tested in three mutually perpendicular positions (to include testing with fill openings and vents, if any, in an inverted position) for at least six hours in each position.

The shipment should have only one hazard class. The most likely entries for SLABs are either Class 8 or Class 9. Class 8 is titled “Corrosive Materials” (see [49 CFR 173.136](#)), and generally covers shipments of SLABs. Class 9 is titled “Miscellaneous Hazardous Materials” (see [49 CFR 173.140](#)), and shipments of “non-spillable” SLABs may qualify to be shipped under this hazard class under the exception provisions of 49 CFR 173.159a. If the shipments of SLABs will potentially include any acid containing SLABs, use Class 8. For more information on the DOT requirements for transporting spent batteries, please see the [2009 Battery Safety Compliance Advisory issued by the DOT’s Pipeline and Hazardous Materials Safety Administration](#).

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