

Guidance for Transporting Used or Spent Lead-acid Batteries

This guidance outlines requirements for transporting used or spent lead-acid batteries.

When is a used lead-acid battery considered hazardous waste?

A used or spent lead-acid battery is hazardous waste as soon as the user no longer has a use for it in its current condition, regardless of whether it is being returned directly to a producer under the Recycling Regulation.

When is a waste lead-acid battery not considered hazardous waste?

A waste lead-acid battery is not hazardous waste only *after* it has been refurbished by a producer and is suitable for reuse.

What are my responsibilities when transporting waste batteries?

All waste lead-acid batteries are "dangerous goods" and are subject to the federal Transportation of Dangerous Goods Regulations (TDGR), including requirements for shipping documentation, labelling, and placarding of vehicles. Waste lead-acid batteries are also hazardous waste and subject to the B.C. Hazardous Waste Regulation (HWR).

When is a license to transport not required?

In most cases, transporting waste-lead acid batteries requires a <u>license to transport</u>. Requirements for a license to transport are found in the B.C. HWR. The use of a licensed carrier is not required if any one of the scenarios below apply:

- 1. Waste lead-acid batteries are transported *directly* from a Return Collection Facility (RCF), temporary collection event or consolidation site to a producer of lead-acid batteries if all of the following are met:
 - a. you comply with the TDGR,
 - b. you have at least \$5,000,000 in third party liability insurance and you prepare and maintain a current contingency plan, and
 - c. the batteries are being managed under an extended producer responsibility plan.
- 2. Waste lead-acid batteries are transported in quantities less than 1,000 kg (about 45 typical vehicle batteries; or
- 3. The generator of waste lead-acid batteries transports the batteries themselves in quantities less than 2,000 kg.

Note that the federal TDGR still apply, even if exempt from B.C. license to transport.

When are manifests not required?

A B.C. hazardous waste manifest is required for most shipments of waste lead-acid batteries. A manifest is not required if the following conditions are met:

- Transporting waste lead-acid batteries in quantities less than 1,000 kg; OR
- The transport is exempt from a license to transport described under scenario # 1 directly above and the RCFs, carriers and receivers:
 - uses a uniquely numbered shipping document compliant with the federal TDGR.
 - o keep records for 2 years of the shipping document,
 - upon request by an officer, provide a copy of the shipping document to the officer, and
 - the shipping document also includes additional information in accordance with Section 42.52 of the HWR.

When is a license to transport and manifesting required?

If transporting waste lead-acid batteries does not meet the conditions for exemption presented above, the batteries must be transported by licensed carriers, using B.C. hazardous waste manifests, and sent only to an authorized consignee¹, RCF or consolidation site as defined in the HWR.

What are the other requirements for transport under the Hazardous Waste Regulation?

Waste lead-acid batteries must be managed and shipped as outlined below:

- Leaking batteries must be stored and shipped in leak-proof secondary containment.
- If stored in upright stacks, lead-acid batteries must not be stacked more than five batteries high.
- Batteries must be stored, stacked or otherwise handled in such a manner that terminals cannot contact one another in order to prevent a short circuit or damage to the battery case.

Additional requirements for shipping are outlined in Section 50 of the Hazardous Waste Regulation (such as requiring labelling according to TDGR).

¹ An authorized consignee is a consignee who has a registered site number and an operational plan approved by a director or has written authorization from a director to accept hazardous waste.

What if I have questions?

- Visit the Ministry's Extended Producer Responsibility website for lead-acid batteries at http://www2.gov.bc.ca/gov/topic.page?id=A73831079C95415294444A09F377ECE5
- Contact the Ministry at hazwaste@victoria1.gov.bc.ca.