



## **Disposal of Used or Spent Lead-acid Batteries for Manufacturers and Suppliers of Batteries**

This guidance outlines requirements for manufacturers and suppliers for collecting, storing, transporting and recycling used or spent lead acid batteries. The requirements of the Hazardous Waste Regulation (HWR) specific to these facilities are outlined in Part 6 of the HWR.

### **Does this guidance apply to me?**

This guidance applies to you if your business activity is the manufacture or supply of new, never-been-used lead-acid batteries **and** you meet the definition of *producer* in the Recycling Regulation.

To qualify as a producer, you must either be a member in good standing of an approved Extended Producer Responsibility plan under Part 2 of the Recycling Regulation or meet all the requirements under Part 3 of the Recycling Regulation.

### **When is a used or spent lead-acid battery considered hazardous waste?**

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

### **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. Delisting under Section 53 of the HWR is not required to refurbish lead-acid batteries.

### **What are the rules for Producers?**

You are expected to assess all incoming waste lead-acid batteries immediately after receipt. They must be stored and transported in compliance with the HWR.

The ministry also requires the following for waste lead-acid batteries, if a producer operates as an RCF:

- A written plan to safely manage leaking or damaged waste batteries must be developed and implemented at each site. Plans developed by extended producer responsibility programs may be adopted at individual sites.
- 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.

### **What are the requirements for RCFs?**

Registration as a RCF can be completed at the link below:

<https://www2.gov.bc.ca/gov/content?id=CCFC390820E6414F87866E3EAE6CAD10>

RCFs can store a maximum of 25,000 kg of waste at any one time. If these quantities are exceeded, the facility must obtain a registered site number, as outlined on this webpage:

<https://www2.gov.bc.ca/gov/content/environment/waste-management/hazardous-waste/registration-of-hazardous-waste-generators-and-facilities>

### **What are the rules for transportation of 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 subject to the B.C. HWR.

### **When is a license to transport not required?**

In most cases, transporting waste-lead acid batteries to and from a producer requires a [license to transport](#). The use of a licensed carrier is not required if any one of the following scenarios apply:

1. Waste lead-acid batteries are transported *directly* from a RCF, temporary collection event or a consolidation site to a producer, and all the following conditions are met:
  - the carrier complies with the TDGR,
  - the carrier has at least \$5,000,000 in third party liability insurance and prepares and maintains a current contingency plan, and
  - 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 per shipment; or,
3. The generator of waste lead-acid batteries transports the batteries themselves in quantities less than 2,000 kg per shipment.

### **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:

- Waste lead-acid batteries are transported 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:
  - use a uniquely numbered shipping document compliant with the federal TDGR,
  - 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 consignee<sup>1</sup>, RCF or consolidation site as defined in the HWR.

### **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](mailto:hazwaste@victoria1.gov.bc.ca).

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