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Environmental Health and Safety (EHS) Policy

Used Batteries

Regulatory Reference: 40 CFR 273, Standards for Universal Waste Management, State specific battery recycling rules.

Purpose: The purpose of this Used Battery Program is to establish a framework for each Fixed Base Operation (FBO) to become and remain compliant with the Federal Environmental Protection Agency (EPA) rules as well as state specific rules for Used Batteries and Universal Waste.

The EPA Universal Waste regulations came about in the early 1990s to allow generators of certain common waste items to properly recycle these items and streamline the requirements for these items. Items regulated in the Universal Waste rules include the following.

- Used Batteries.
- Used Florescent Lamps.
- Pesticides.
- Mercury containing equipment.

General Requirements:

The FBO handles a variety of batteries from large lead acid batteries to small nickel cadmium rechargeable batteries. Most of these batteries contain hazardous materials and thus must be handled properly to ensure no damage to the environment occurs.

The Federal EPA has set forth rules for proper handling and recycling of used batteries under the Universal Waste Rules and the requirements for handling these items are simpler than the rules governing hazardous waste. A significant part of these rules includes the proper recycling of the used batteries. Recycling batteries keeps them out of the landfills and thus protects the environment from potentially hazardous waste. The regulations include recordkeeping requirements for Large Quantity Handlers (greater than 5,000 KG stored at any one time), but all FBO operations should fall below this limit and thus should not be required to maintain specific records.

Proper handling of used batteries includes proper labeling. Each battery or each storage location must be labeled as "Used Batteries" and the storage area needs to be labeled with the date accumulation began (date of last shipment) as batteries can be stored no more than one year.

Employees must not transport used batteries to recycling center. Use only an approved transporter (usually the company that recycles the batteries).

If a leak occurs on any battery, the leak must be immediately contained. Use absorbent materials to capture the leak and place the battery in a pan or other container that will contain any residual leaking fluid. Handle all clean-up wastes per EPA Hazardous Waste rules.

Responsibilities:

1. Employees:

Employees must be aware of the requirements for the handling of used batteries, properly recycling used batteries, and proper response to a spill.

Employees must properly store and label used batteries and must mark the storage area with the date that batteries were accumulated (date of last shipment to the recycler). Batteries must be accumulated for a period of less than one year before they are sent to a recycler.

Employees must know the proper method to respond to a leaking battery and how to contain any leaking fluid.

Employees must participate in a training session to discuss proper handling and proper spill response. Training only needs to be completed initially and no refresher training is required.

2. Managers/Supervisors:

Managers/Supervisors should ensure that employees are performing their work activities in a proper manner including handling, recycling, and spill response.

Managers/Supervisors should ensure that employees respond appropriately to spills. Managers/Supervisors should make notifications to Federal, State, and Local environmental regulatory agencies if required.

Managers/Supervisors should ensure batteries are stored for less than one year before they are shipped to a recycler.

Managers/Supervisors should ensure that used batteries are properly labeled.

Managers/Supervisors should ensure employees participate in the required training.

3. EHS/Safety Department:

The Environmental Health and Safety (EHS)/Safety Department will monitor compliance with all environmental regulations including Universal Waste and used batteries.

The EHS/Safety Department will assist FBOs in setting up initial “train the trainer” sessions and can assist in any environmental questions that may arise.

The EHS/Safety Department must be notified of any reportable spill event and will properly document in the company tracking system.

Training:

Employees must be trained to include proper handling and emergency procedures. This training is only required initially and no refresher training is required. EHS/Safety is planning to develop training materials and make them available to each FBO.

Recordkeeping:

No shipping records or manifests are required.

Documentation of the training activities must be maintained and must include the person's name, date of training, and topics covered.