



Spent Lead-Acid Battery Management

This fact sheet summarizes the requirements for spent lead-acid battery management. The batteries discussed here are equivalent in size and type to common vehicle batteries, including utility batteries and those used in emergency power supplies. Because they contain lead and sulfuric acid, lead-acid battery disposal is fully regulated as a hazardous waste management activity but when intact lead-acid batteries are managed for recycling the handling requirements are relaxed. Processing lead-acid batteries for recycling by draining the electrolyte, crushing, smelting, or other physical methods would require a hazardous waste treatment permit approved by Department of Toxic Substances Control. In addition, it is illegal to dispose of a lead-acid battery on or in any land, including landfills, lakes, streams, or the ocean.

Storage Requirements

Businesses should store batteries prior to shipment to a recycler as follows:

Undamaged batteries should be stored upright on a covered pallet over a non-reactive, curbed and sealed surface such as coated concrete or asphalt. Care should be taken to prevent the terminals from short-circuiting.

Damaged batteries are batteries that are cracked, broken or missing one or more caps. The business must store and transport damaged batteries in non-reactive, structurally secure and closed containers such as polyethylene buckets or drums. If missing caps can be replaced and there are no other leaks or damage, the battery can be managed along with intact batteries.

Accumulation Requirements

Businesses must label containers holding damaged batteries in ink or paint with the date the first battery was placed there. This is considered the accumulation start date. There are no labeling requirements for undamaged batteries, but there are associated accumulation time limits for both damaged and undamaged batteries, as follows:

- Businesses that have less than one ton of batteries may store the batteries on site for no more than one year.
- Businesses that have more than one ton of batteries may not store them longer than 180 days.

If these quantities or times are exceeded, the business is no longer exempt from the regulations for generation, storage and transportation of hazardous waste.

Transportation Requirements

If a business ships more than ten batteries at a time, a legible hazardous waste manifest or a legible bill of lading must accompany the shipment. The generator, transporter and storage, recycling, or disposal facility each must retain their copies of either of those documents for three years. The bill of lading must be dated and must show the name and addresses of the generator, transporter and receiving location as well as the number of batteries transported. The business may transport damaged batteries (packaged as described above) with intact batteries as long as all Department of Transportation (DOT) standards are met.

Record Keeping Requirements

Businesses generating or handling more than ten batteries per year and those who transport more than ten batteries at a time are required to keep all copies of bills of lading and manifests related to the transportation of

lead-acid batteries for a period of at least three years.

Businesses generating no more than ten batteries per year and storing or transporting no more than ten batteries at one time are not subject to the reporting and record keeping requirements given in the battery regulations, as long as the batteries will go to someone who stores, recycles, uses, reuses, or reclaims them. This also applies to people who trade in an old battery for a new one and to the person accepting the trade-in. All businesses, however, must comply with storage and accumulation requirements given in the battery regulations.

Note: This fact sheet is intended for informational purposes only and may not encompass all the laws and regulations to this topic. More details may be found at Cal/EPA Department of Toxic Substance Control: www.dtsc.ca.gov. If further information is needed, call the County of Los Angeles CUPA at (323) 890-4045, or your local district office.

References

- [California Health and Safety Code 25215](#)
- [Title 22 California Code of Regulations 66266.81](#)
- [Cal/EPA DTSC Fact Sheet: "Management of Spent Lead-Acid Batteries"](#)