

Comments

"Shipping Batteries Safely By Air: What You Need To Know"

July 29, 2008

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Comments: The Portable Rechargeable Battery Association (PRBA) appreciates the U.S. DOT's work on drafting this document and believes it will help shippers of these products to have a better understanding of the regulatory requirements for shipping batteries.

We must caution that some of the information in the document is not accurate in light of the upcoming changes to the lithium battery regulations that go into effect on October 1, 2008 for "small" and "medium" batteries and the UN testing requirements that go into effect on October 1, 2009 for "small" batteries. In addition, the international lithium battery dangerous goods regulations that go into effect on January 1, 2009 will significantly change how these materials are regulated. Assuming the U.S. DOT issues a proposed rule this year to harmonize with the new lithium battery provisions in the international dangerous goods regulations, it may be prudent to address some of these changes in this document.

PRBA's additional comments are provided below.

Page 5 - First paragraph: International Civil Aviation Organization (not "Association")

Page 7 - Use of the phrase "common sense" is not particularly effective and should be deleted.

Page 8 - In the last line of the "What's different about lithium batteries?" paragraph, change "...over the last five years" to "...in recent years." This makes the statement transparent relative to which year someone may be reading the document.

Page 8 - The first sentence on page 8 that starts with "Rechargeable lithium batteries ..." should be amended at the end as follows: "...provide more energy and a longer operating life than other battery chemistries."

Page 9 - Add the words "as cargo" as noted in the following: "Non-rechargeable (i.e., metal/primary) lithium batteries may not be transported as cargo aboard passenger aircraft and packages containing those batteries must be marked:"

Page 9 - At the bottom of the red box describing the "Forbidden for transport..." markings, note that minimum letter height requirements apply, referring to appropriate regulation in 49 CFR.

Page 9 - The red border around the marking for primary lithium batteries may lead readers to believe it is required. The red border on this page should be removed from the document.

Page 10 - Edit the following sentence as shown: "These size categories depend on the lithium metal or alloy (Li) content of a non-rechargeable battery or cell, or the equivalent lithium content (ELC) of a rechargeable lithium battery or cell."

Page 10 - How to calculate equivalent lithium content should be referenced on this page.

Page 10 - As shown, there is a conflict in the battery and cell category definitions

table. The 1.0 g li. Medium "Between" quantity overlaps with the 1.0 g li. Small quantity. As written, it can cause confusion as to whether or not 1.0 / 2.0 g; 1.5 / 8 g content falls into the Small or Medium category.

Page 12 - The statement "Small lithium batteries and cells must pass tests found in the UN Manual of Tests and Criteria" is not an accurate statement. Under 49 CFR, small cells and batteries are not subject to these tests until October 1, 2009.

Page 13 - Edit sentence by adding "as cargo" as shown. "Primary (non-rechargeable) lithium batteries and cells are forbidden for transport as cargo aboard passenger carrying aircraft (see Page 9). Secondary (rechargeable) small lithium batteries and cells are authorized as cargo aboard passenger carrying aircraft."

Page 13 - The weight limit of "No more than 30 kg (66 pounds)" per package does not apply to batteries packed with equipment and thus should be noted.

Page 13 - The italicized text at the bottom of the page should state "Does not apply to cells or batteries contained in equipment."

Page 14 - The aircraft quantity limits for medium lithium ion batteries is not accurate. Under the current 49 CFR, SP 190 there is no weight limitation on UN-tested medium lithium ion batteries shipped by passenger or cargo aircraft. Of course that will change starting October 1, 2008 when these batteries must be shipped as fully-regulated Class 9 hazardous materials on aircraft.

Page 15 - The reference to Special Provision 189 next to the "Sample Packaging and Fully Regulated UN3090" is incorrect. SP 189 contains exceptions to the regulations and does not contain UN specification packaging requirements.

Page 17 - Edit sentence by adding "as cargo" as shown: "Primary (non-rechargeable) lithium batteries and cells are forbidden for transport as cargo aboard passenger carrying aircraft (see Page 9). Secondary (rechargeable) lithium batteries and cells are authorized as cargo aboard passenger carrying aircraft in packages that do not exceed a gross weight of 5 kg (11 pounds)." There also should be an explanation for shipping by cargo aircraft and the appropriate weight limits.

Page 23 - It should be noted that lithium batteries used for battery powered vehicles/equipment also are subject to UN testing requirements.