

Special Permit Information for Shipping Batteries By Plane



Does your air carrier require you to have a special permit for shipping used batteries to be recycled? If so, there are two things you can do:

1. Ship your batteries with your local air carrier to Interstate Battery and use Interstate's existing permit
2. Request your own permit from DOT

To use Interstate's existing permit, contact Vern at Interstate Battery in Anchorage at (907) 349-1577. Let him know that you have batteries that you want to recycle, and tell him who your local air carriers are. Once the logistics are figured out, he will send you a copy of Interstate's permit to use for shipping the batteries. Note -- the batteries need to be properly packaged in plastic totes. See the packaging section on page 3 of this document.

To request your own permit from DOT, follow the information in this document.

Overview

Some air carries (like Northern Air Cargo) may require you to ship used batteries in "air approved containers" because of FAA regulations. Air approved containers are specially made containers that pass DOT specifications and can be purchased through places such as freight companies. Unfortunately these containers aren't cheap (they cost from \$12-\$45 and each container only holds one battery).

If your community can't afford to purchase these containers, the good news is that you can apply for a Special Permit from DOT which allows you to use regular plastic fish totes to ship batteries (like the photo to the right). Note that if you are shipping batteries by **barge**, the regulations are less strict - you don't need a permit, and you can package batteries on wooden palettes (shrink-wrapped) or plastic boxes/totes.



Plastic fish tote that can be used to ship batteries

How do I get a Special Permit?

Fortunately it's not too hard to get a permit and it doesn't take much time. To apply, simply write a **short "hardship letter"** to the Department of Transportation (DOT). This letter explains that you need a special permit because it is important to ship batteries out of your community, and it is difficult to pay for DOT-spec packaging for shipping the batteries.





What should the letter say?

To view a sample letter for requesting a permit, go to

http://www.zendergroup.org/docs/sample_letter.doc

If you want to write your own letter, include the following:

- ◆ The first line of the letter should state that your organization (e.g. Tribe or City) "would like to obtain party status for DOT-SP 12283. "
- ◆ Explain that you have used batteries that you must ship out of your community to be recycled or properly disposed of because your community doesn't have a safe way to dispose or store hazardous waste, and your waste disposal site is unlined.
- ◆ Explain that if you dispose of batteries in your community they can contaminate your land and water and affect subsistence and the health of the community.
- ◆ Explain that your community doesn't have the finances to purchase DOT-spec packaging.
- ◆ The letter must also include the name, address, and phone number of the contact at your organization.

Where do I send the letter?

The letter may be **emailed, faxed, or mailed** to the following address:

Associate Administrator for Hazardous Materials Safety
Attention: Special Permits, PHH-31
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
400 7th Street, SW.
Washington, DC 20590-0001
Fax: (202) 366-3753 or (202) 366-3308
E-mail: Specialpermits@dot.gov



How long will it take to hear back about the permit?

We've heard that DOT is pretty fast when issuing permits for hardship cases. We've heard of people being issued their permits as soon as a few days and as late as four weeks after DOT receives the letter. If you have email, be sure to **include your email address** in the letter because DOT can email you the permit when it's ready, and it's probably the fastest way to get it. If a couple weeks have passed after you have submitted your letter and you haven't heard anything, send them an email at Specialpermits@dot.gov or give them a call at (202) 366-4511 to ask about the status of your application.

What will the permit look like?

To view a sample permit, go to http://www.zendergroup.org/docs/sample_permit.pdf On the last page you can also view other organizations that have applied and received a permit.

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What do we do with the permit when we get it?

When you receive your permit, keep the original and a back-up copy on-file. Every time you ship batteries you will need to tape a **copy** of the full permit to the outside of the packaged batteries.

How do we need to package the batteries once we get the permit? CONTAINER REQUIREMENTS

Once you receive the permit, you will see that it contains specific packaging requirements for batteries. The batteries must be packaged in sturdy **plastic totes** or **plastic boxes** that don't have cracks or holes and don't leak. Many communities have extra plastic fish totes around that aren't being used. If your community doesn't have any spare totes, you can purchase totes with lids for around \$200-\$300 at the following locations. Note, if you know of other places that sell totes, you can let other Villages know by posting a message on the SWAN message board <http://members.boardhost.com/SWAN/>

Companies that sell plastic totes

Anchorage

Arctic wire and rope 1 800 478-0707 or (907) 562 0707

Fairbanks

Arctic Fire and Safety 1 800 260-3473 or (907) 452-7806

Dillingham

BBEDC (907) 842-4370

Juneau

Western Auto & Marine (907) 780-4909

Sitka

Murray Pacific Supply 1 800 478-3171

Ketchikan

Murray Pacific Supply 1 800 478-3138 or (907) 225-3135

Cordova

LFS Marine Supplies (907) 424-5495 or Toll Free in Seattle 1 800 647-2138



Example of plastic totes that can be used to ship batteries

HOW TO PACKAGE THE BATTERIES

Once you have a plastic tote/box to use, here are the recommendations for packing the batteries in the totes:

1. Place a sheet of plywood on the bottom of the tote.
2. If available in your Village, sprinkle some kitty litter on top of the plywood (kitty litter is absorbent material in case any of the batteries are leaking). Otherwise, try to use another absorbent material, such as vermiculite, or hazardous waste spill pads. (go to http://www.ccthita-swan.org/main/safety_gear.cfm for where to purchase these materials, or you may be able to get them from Vern at Interstate Battery (907) 349-1577).
3. Lay down a layer of batteries.

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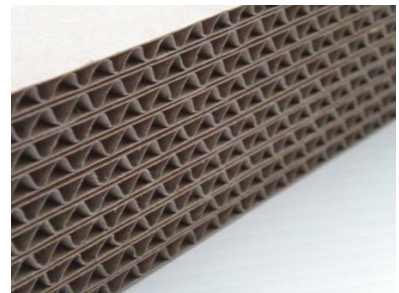
4. If you have only one layer of batteries, put enough sheets of "waffle" cardboard on top of the batteries so it reaches the top of the tote. The waffle board makes the batteries secure so they won't move around during transport.
5. If you have a second layer of batteries, put 1-2 sheets of waffle cardboard on top of the first layer, then the second layer of batteries, then more waffle cardboard until it reaches the top of the tote.
6. Finally, put the lid on the tote and band it with banding tape, ratchet straps or anything else that will secure the lid tight.
7. Tape a copy of the special permit to the outside of the tote.

As specified in the permit, the total maximum weight of batteries per tote is 1800 lbs (not including the weight of the tote). Typical ATV and Snowmachine batteries weigh about 12 lbs and car batteries weigh about 30 to 35 lbs. Boat or truck lead-acid batteries can weigh as much as 75 lbs.

A NOTE ABOUT "WAFFLE" CARDBOARD

Waffle cardboard (also known as honeycomb cardboard) is thick, but light. Examples are shown in the photos to the right.

Waffle cardboard must be used instead of regular cardboard when packing batteries for transport by air using the special permit. The reason is that the battery terminals may not support the weight of what's on top of them. When you use waffle cardboard, the battery terminals poke through a little--but then the rest of the battery holds the majority of the weight from above. If you are shipping batteries to **Interstate Battery**, they may be able to **send you sheets of waffle cardboard for free**. Call Vern at Interstate at (907) 349-1577. You may also be able to purchase sheets of waffle cardboard from the battery recyclers listed on the next page. If you can't get any waffle cardboard, you could use flattened cardboard boxes instead --if you **place pieces of wood** on the batteries so that the cardboard sits on the wood and **not** the battery terminals.



Examples of "waffle" cardboard



How to safely handle and store batteries

Safety gear: Batteries should be handled with protective gear. Rubber gloves, polyester clothes and protective eyewear are highly recommended.

Go to http://www.ccthita-swan.org/main/safety_gear.cfm for information about where to purchase safety gear, as well as spill pads to underlay the batteries.



Storage: Batteries should be stored off-the-ground and covered. Try a shed, shipping container, or fish tote. If batteries are exposed to sun, rain, or cold temperatures,





they may crack and leak acid and heavy metals. **Make sure contaminants from leaking batteries cannot enter the soil or nearby water.**

Go to http://www.ccthita-swan.org/Tutorials/storing_hazwaste.cfm for further information about how to safely store batteries and other hazardous wastes.

Getting your totes back

One of the biggest problems we hear from Tribes is how to reliably get their empty totes back. Several Villages have been able to work with their air carriers to get their empty totes shipped back to them on a space available basis. In some hub cities, the local recycling organization and/or the battery recycling company has been able to help ensure that empty totes get sent back to Villages.

The most important rule is to make sure your Village name, address, and phone number is on every tote that is sent out, and the address is very visible. It could say something like "Please Return Empty Tote To Raven Village As Soon As Possible...." If you have included the kitty litter or absorbent padding, and it is still dry, ask for that back as well, so that you can reuse the liner. If you ship batteries to Interstate through Northern Air Cargo, they said they will make sure your empty totes get sent back to you. If you have ideas or want to post questions about how to get empty totes back, you can post and read messages to/from other Villages at the SWAN message board

<http://members.boardhost.com/SWAN/>.



How to contact lead-acid battery recyclers

Anchorage:

Interstate Batteries, (907) 349-1577 ask for Vern
 Battery Specialists of Alaska, 276-5251
 NAPA Auto Parts, 563-3637
 Exide Batteries, 344-1390

Bethel:

NAPA Auto Parts 543-2673

Kotzebue:

City of Kotz Landfill 442-3470 or 442-5200

Seattle:

Allied Batteries, (206) 762-5522
 Dyno Battery, (206) 283-7450

Fairbanks:

ABS Alaska Battery Recycling, 452-2002
 Jackovich Industrial & Construction Supply, 456-4900

Dillingham:

NAPA Auto Parts 842-4200

Who can I contact if I have any questions?

You can contact the **US DOT Special Permits Office** directly at
 Tel: (202) 366-4511, Fax: (202) 366-3753 or (202) 366-3308, Email:
Specialpermits@dot.gov

You can also contact **Mark Smith at Northern Air Cargo**. Mark is very friendly and knows a lot about obtaining these types of permits. You can call him at (907) 243-3331 to ask him any questions about getting these permits, or general questions about shipping batteries.





You can contact **Vern at Interstate Battery** at (907) 349-1577 to arrange shipment or pickup of batteries.

You can also contact **Joe Sarcone at EPA** at (907) 271-1316 if you have any other questions about recycling/disposing of batteries.

Website resources

Recycling Lead-Acid Batteries	http://www.zendergroup.org/docs/battery_leadacid.pdf
Counting Your Battery Wastestream	http://www.zendergroup.org/docs/battery_counting.pdf
What To Do With Household Batteries	http://www.zendergroup.org/docs/battery_household.pdf
Household Battery Summary	http://www.zendergroup.org/docs/battery_table.pdf
EPA Battery Recycling website	http://www.epa.gov/epaoswer/non-hw/muncpl/battery.htm
Rechargeable Battery Recycling Corp.	http://www.rbrc.org/call2recycle/

To read more about the relevant regulations:

Application for Party Status for Hazardous Materials CFR 49 §107.107

<http://cfr.vlex.com/vid/107-application-for-party-status-19943226>

Non-bulk Packaging for Hazardous Materials (Wet Batteries such as lead-acid vehicle batteries) [http://ecfr.gpoaccess.gov/cgi/t/text/text-](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&rgn=div5&view=text&node=49:2.1.1.3.8&idno=49#49:2.1.1.3.8.5.25.2)

[idx?c=ecfr&rgn=div5&view=text&node=49:2.1.1.3.8&idno=49#49:2.1.1.3.8.5.25.2](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&rgn=div5&view=text&node=49:2.1.1.3.8&idno=49#49:2.1.1.3.8.5.25.2)

