

Supplemental Information on Panasonic Valve-Regulated Lead Acid Batteries

Transportation

All Panasonic valve-regulated lead acid batteries are considered “non-spillable” for purposes of transportation by the U.S. Department of Transportation (DOT), International Civil Aviation Administration (ICAO), the International Air Transport Association (IATA) and the International Maritime Dangerous Goods regulations (IMDG). They are considered “non-spillable” by DOT by passing the Vibration Test and Pressure Differential Test as required in 49 CFR 173.159(d). They are also considered to be “non-spillable” by both ICAO and IATA by exceeding the requirements of Special Provisions “A67” as defined in their 1998 Handbooks.

Our batteries are authorized for transportation on deck or under deck storage on either a passenger or cargo vessel by passing the Vibration and Pressure Differential Tests as described in the International Maritime Dangerous Goods Regulations (IMDG).

To transport these batteries as “non-spillable” they must be shipped in a condition that would protect them from short-circuits and be securely packaged so as to withstand conditions normal to transportation. For transportation by a consumer, in or out of a device, they are unregulated thus requiring no additional special handling or packaging.

All of our lead acid batteries and their outside packaging, manufactured after September 30, 1995 are labeled “NON-SPILLABLE” per 49 CFR 173.159(d). If you repackage our batteries either as batteries or as a component of another product you must label the outer package “NON-SPILLABLE” per 49 CFR 173.159(d).

Assure Proper Recycling!

Valve-Regulated Lead Acid batteries destined for recycling can be managed under the federal *Universal Waste Rule* codified at 40 CFR Part 273.

In the event of disposal, dispose only in accordance with federal, state and local regulation. Batteries generated as a waste are subject to the Resource Conservation and Recovery Act (RCRA) as a D008 (lead) hazardous waste.

Panasonic VRLA Recycling Program

The Panasonic 1-800-SAV-LEAD Recycling Program for the collection and recycling of valve-regulated lead acid batteries (VRLA) covers all Panasonic Valve-Regulated Lead Acid Batteries. The proper disposal of spent VRLA batteries is becoming more of a critical issue, both from the viewpoint of environmental stewardship and from compliance with federal and state environmental regulations. Panasonic recognizes the burdens and responsibilities that have been placed on our customers to properly dispose of spent VRLA batteries and is proud to offer this voluntary nationwide battery recycling program.

Federal and State Requirements for Proper Disposal

Federal and State laws prohibit the improper disposal of all lead acid batteries. The battery end users (owners) are responsible for their batteries from the date of purchase through their ultimate disposal. The only legally acceptable method of disposal of lead acid batteries is to recycle them at Resource Conservation and Recovery Act (RCRA) approved secondary lead smelter. This Panasonic 1-800-SAV-LEAD Recycling Program will allow for you to arrange for the recycling of your VRLA batteries from anywhere in the United States. The Program will accept Panasonic and other VRLA batteries regardless of manufacturer. Panasonic will handle all VRLA batteries returned in an environmentally sound manner designed to comply with all applicable Federal and State laws and regulations. Panasonic will send batteries only to fully-permitted secondary lead smelters that we believe meet the highest environmental standards. Once the VRLA batteries are received by Panasonic, the cost to transport the batteries to the secondary lead smelter and the actual recycling costs will be borne by Panasonic.

See the next page for [How the 1-800-SAV-LEAD Recycling Program Works](#)

Supplemental Information on Panasonic Valve-Regulated Lead Acid Batteries (Cont.)

How the 1-800-SAV-LEAD Recycling Program Works

- 1) We encourage all of our customers to serve as VRLA collection centers for your customers, thereby establishing a reverse distribution network between the end user and the secondary lead recycling facility.
- 2) All shipments to our national consolidation facility must be prepaid. No freight collect shipments will be accepted. All freight collect and non-VRLA batteries will be returned to the shipper.
- 3) Panasonic will maintain on file all necessary documentation for EPA reference. A copy will be provided upon request.
- 4) All batteries must be shipped, prepaid to Ebco Battery Company that serves as our national consolidation facility. (See *exception* below).

SHIPPING ADDRESS:
Ebco Battery Company
4017 Warm Springs Road
Columbus, Georgia 31909

- 5) Only VRLA batteries that meet the U.S. Department of Transportation (DOT) "NON-SPILLABLE" (49 CFR 173.159d) requirements will be accepted by this program.
- 6) Panasonic reserves the right to alter or discontinue this program at any time.

Packaging Requirements

- 1) All VRLA batteries must be fully discharged and packaged in a manner as to insure safe handling and conform to all applicable DOT regulations. (49 CFR 173.159d). A dab of silicon caulking or non-conductive tape on each terminal will ensure that no direct shorts occur during shipment.
- 2) VRLA battery shipments should be made in pallet quantities whenever possible.
- 3) Palletized shipments should be secured with metal bands or poly-wrapped with stack height limited to four (4) feet.
- 4) VRLA batteries shipped on pallets should be of uniform size or be stacked with the larger batteries on the bottom.
- 5) VRLA batteries should be stacked upright in a head-to-base arrangement. Each layer should be separated by cardboard to prevent accidental shorting.
- 6) Smaller quantities of VRLA batteries may be shipped via standard UPS. Be sure that each box does not exceed the UPS weight limit of 70 lbs. A dab of silicon caulking or non-conductive tape on each terminal will ensure that no shorts occur during shipment.
- 7) The outside of every pallet and individual box must be labeled "NON-SPILLABLE" as required by DOT regulations. This label must be visible during transportation.

Exception:

Full-Truck-Loads – All full-truck-load shipments of VRLA batteries must be scheduled 48 hours in advance. To schedule shipments to our consolidation site, please be sure to fax a scheduling request (including contact name and phone number) to Ebco Battery Company at fax: (706) 569-6774.

Consumer Users of Panasonic VRLA Batteries

All Panasonic VRLA batteries are chemically identical to common automotive starter batteries and can be returned to any site that accepts automotive lead acid batteries for recycling. Examples include retailers of automotive batteries, automotive service centers, scrap metal dealers, etc...

For additional information on this program or information on how to recycle other Panasonic batteries please call your local Panasonic Battery Sales Group sales office.

Panasonic Batteries

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