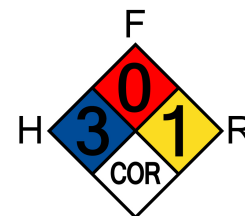




TROJAN BATTERY COMPANY
VALVE REGULATED LEAD ACID BATTERY

HAZARD RATING



SAFETY DATA SHEET

SECTION 1 – PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: VALVE REGULATED LEAD ACID BATTERY CHEMICAL FAMILY: THIS PRODUCT IS A GEL/ABSORBED ELECTROLYTE TYPE LEAD ACID BATTERY	PRODUCT USE: INDUSTRIAL/COMMERCIAL ELECTRIC STORAGE BATTERY
MANUFACTURER'S NAME: TROJAN BATTERY COMPANY	EMERGENCY TELEPHONE NUMBER: CHEMTREC +1(800) 424-9300 INTERNATIONAL +1(703) 527-3887
ADDRESS: 12380 CLARK ST., SANTA FE SPRINGS, CA 90670	OTHER INFORMATION CALLS: +1(562) 236-3000 +1(800) 423-6569
EHS TECHNICAL CONTACT NUMBERS: +1(978) 727-2206 OR +1(610) 858-6192	REVISION DATE: MARCH 11, 2021

SECTION 2 – GHS HAZARD IDENTIFICATION

Signs and Symptoms of Exposure	1. Acute Hazards	Do not open battery. Avoid contact with internal components. Internal components include lead and liquid electrolyte. Electrolyte - Electrolyte is corrosive and contact may cause skin irritation and chemical burns. Electrolyte causes severe irritation and burns of eyes, nose and throat. Ingestion can cause severe burns and vomiting. Lead -Direct skin or eye contact may cause local irritation. Inhalation or ingestion of lead dust or fumes may result in headache, nausea, vomiting, abdominal spasms, fatigue, sleep disturbances, weight loss, anemia and leg, arm and joint pain.
2. Sub-chronic and Chronic Health Effects	Electrolyte - Repeated contact with sulfuric acid battery electrolyte fluid may cause drying of the skin which may result in irritation, dermatitis, and skin burns. Repeated exposure to sulfuric acid mist may cause erosion of teeth, chronic eye irritation and/or chronic inflammation of the nose, throat and lungs. Lead - Prolonged exposure may cause central nervous system damage, gastrointestinal disturbances, anemia, and wrist-drop and kidney dysfunction. Pregnant women should be protected from excessive exposure to prevent lead from crossing the placental barrier and causing infant neurological disorders.	
Medical Conditions Generally Aggravated by Exposure	If battery is broken or material is spilled, then persons with the following medical conditions must take precautions: pulmonary edema, bronchitis, emphysema, dental erosion and tracheobronchitis.	

Routes of Entry	Inhalation - YES Ingestion - YES	Eye Contact - YES Skin Contact - YES				
Chemical(s) Listed as Carcinogen or potential Carcinogen	Proposition 65 - YES	National Toxicology Program - YES	I.A.R.C. Monographs - YES	OSHA - NO	EPA CAG - YES	NIOSH - YES

Health		Environmental	Physical
Acute Toxicity (Oral/Dermal/Inhalation) Skin Corrosion/Irritation Eye Damage Reproductive Carcinogenicity (lead compounds) Carcinogenicity (acid mist) Specific Target Organ Toxicity (repeated exposure)	Category 4 Category 1A Category 1 Category 1A Category 1B Category 1A Category 2	Aquatic Chronic 1 Aquatic Acute 1	Explosive Chemical, Division 1.3

Signal Word: DANGER

GHS LABEL

Health	Environmental	Physical
  		
Hazard Statements DANGER! Harmful if swallowed, inhaled, or in contact with skin. Acid causes severe burns and eye damage. May damage fertility or the unborn child if ingested or inhaled. May cause harm to breast-fed children. May cause cancer if ingested or inhaled. Causes skin irritation, serious eye damage. Contact with internal components may cause irritation or severe burns. Causes damage to central nervous system, blood and kidneys, through prolonged or repeated exposure if ingested or inhaled.	Precautionary Statements Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Wash thoroughly after handling. Do not eat, drink or smoke when using this product. Avoid contact during pregnancy/while nursing. Wear protective gloves/protective clothing, eye protection/face protection. Use only outdoors or in a well-ventilated area. Avoid contact with internal acid. Do not breathe dust/fume/gas/mist/vapors/spray. Keep away from heat/sparks/open flames/hot surfaces. No smoking. If swallowed or consumed: Rinse mouth. Do NOT induce vomiting. Call a poison center/doctor if you feel unwell. If on clothing, skin, or hair: Remove/take off immediately all contaminated clothing and wash it before reuse. Rinse skin with water/shower. If inhaled: Remove person to fresh air and keep comfortable for breathing. Immediately call a POISON CENTER or doctor/physician.	

Irritating to eyes, respiratory system, and skin.
May form explosive air/gas mixture during charging.
Explosive, fire, blast, or projection hazard.

If in eyes: Rinse cautiously with water for several minutes.
Remove contact lenses, if present and easy to do. Continue rinsing.
If exposed/concerned, or you feel unwell seek medical attention/advice.
Store locked up in a well-ventilated area, in accordance with local and national regulation.
Dispose of contents/container in accordance with local and national regulation.
Keep out of reach of children.

HEALTH HAZARDS		
Acute Toxicity	Signal Word	Hazard Statement
Oral A.1 (6)	Warning	H302: Harmful if swallowed
Dermal A.1 (5)	Warning	H312: Harmful in contact with skin
Inhalation A.1 (5)	Warning	H332: Harmful if inhaled
Skin Irritation		
A.2 (2)	Warning	H315: Causes skin irritation
Skin Corrosion		
A.2 (1A,1B,1C)	Danger	H314: Causes serious skin burns and eye damage
Serious Eye Damage		
A.3 (1)	Danger	H318: Causes serious eye damage
Eye Irritation		
A.3 (2A)	Warning	H319: Causes serious eye irritation
Respiratory Sensitization		
A.4 (1A, 1B)	Danger	H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled
Skin Sensitization		
A.4 (1A, 1B)	Warning	H317: May cause an allergic skin reaction
Germ Cell Mutagenicity		
A.5 (1A, 1B)	Danger	H340: May cause genetic defects
A.5 (2)	Warning	H341: Suspected of causing genetic defects
Carcinogenicity		
A.6 (1A, 1B)	Danger	H350: May cause cancer
A.6 (2)	Warning	H351: Suspected of causing cancer

Reproductive Toxicity		
A.7 (1A, 1B)	Danger	H360: May damage fertility or the unborn child.
A.7 (2)	Warning	H361: Suspected of damaging fertility or the unborn child.
Specific Target Organ Toxicity Single Exposure		
A.8 (1)	Danger	H370: Causes damage to organs
A.8 (2)	Warning	H371: May cause damage to organs
Specific Target Organ Toxicity Repeated or Prolonged Exposure		
A.9 (1)	Danger	H372: Causes damage to organs
A.9 (2)	Warning	H373: May cause damage to organs
Aspiration Hazard		
A.10 (1)	Danger	H304: May be fatal if swallowed and enters airways
ENVIRONMENTAL HAZARDS		
Aquatic Toxicity Acute		
1.1	Warning	H400: Very toxic to aquatic life
Aquatic Toxicity Chronic		
2.1	Warning	H410: Very toxic to aquatic life with long lasting effects

SECTION 3 – COMPOSITION/INFORMATION ON INGREDIENTS

C.A.S.	PRINCIPAL HAZARDOUS COMPONENT(S) (Chemical & common name(s))	Hazard Category	% by Wt:
7439-92-1	Lead/Lead Oxide/Lead Sulfate	Acute-Chronic	60 - 85%
7664-93-9	Sulfuric Acid (Battery Electrolyte)	Reactive-Oxidizer Acute-Chronic	10 - 30%
7440-70-2	Calcium	Reactive	< 0.2%
7440-31-5	Tin	Chronic	< 1%

SECTION 4 – FIRST AID MEASURES

INHALATION:

Sulfuric Acid: Remove to fresh air immediately. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Consult a physician.

Lead: Remove from exposure, gargle, wash nose and lips; consult physician.

INGESTION:

Sulfuric Acid: Give large quantities of water; Do NOT induce vomiting or aspiration into the lungs may occur and can cause permanent injury or death; consult physician.

Lead: Consult physician immediately.

SKIN:

Sulfuric Acid: Flush with large amounts of water for at least 15 minutes; remove contaminated clothing completely, including shoes. If symptoms persist, seek medical attention. Wash contaminated clothing before reuse. Discard contaminated shoes.

Lead: Wash immediately with soap and water.

EYES:

Sulfuric Acid and Lead: Flush immediately with large amounts of water for at least 15 minutes while lifting lids; Seek immediate medical attention if eyes have been exposed directly to acid.

SECTION 5 – FIREFIGHTING MEASURES

Flash Point: Not Applicable

Flammable Limits: LEL = 4.1% (Hydrogen Gas in air); UEL = 74.2%

Extinguishing media: CO₂; foam; dry chemical. Do not use carbon dioxide directly on cells. Avoid breathing vapors. Use appropriate media for surrounding fire.

Fire Fighting Procedures: Use positive pressure, self-contained breathing apparatus. Beware of acid splatter during water application and wear acid-resistant clothing, gloves, face and eye protection. If batteries are on charge, shut off power to the charging equipment, but note that strings of series connected batteries may still pose risk of electric shock even when charging equipment is shut down.

Hazardous Combustion Products: Highly flammable hydrogen gas is generated during charging and operation of batteries. If ignited by burning cigarette, naked flame or spark, may cause battery explosion with dispersion of casing fragments and corrosive liquid electrolyte. Carefully follow manufacturer's instructions for installation and service. Keep away all sources of gas ignition and do not allow metallic articles to simultaneously contact the negative and positive terminals of a battery. Follow manufacturer's instructions for installation and service.

SECTION 6 – ACCIDENTAL RELEASE MEASURES

Procedures for Cleanup: Stop release, if possible. Avoid contact with any spilled material. Contain spill, isolate hazard area, and deny entry. Limit site access to emergency responders. Neutralize with sodium bicarbonate, soda ash, lime or other neutralizing agent. Place battery in suitable container for disposal. Dispose of contaminated material in accordance with applicable local, state and federal regulations. Sodium bicarbonate, soda ash, sand, lime or other neutralizing agent should be kept on-site for spill remediation.

Personal Precautions: Acid resistant aprons, boots and protective clothing. ANSI approved safety glasses with side shields/face shield recommended. Ventilate enclosed areas.

Environmental Precautions: Lead and its compounds and sulfuric acid can pose a severe threat to the environment. Contamination of water, soil, and air should be prevented.

SECTION 7 – HANDLING AND STORAGE

Handling: Unless involved in recycling operations, do not breach the casing or empty the contents of the battery. Handle carefully and avoid tipping, which may allow electrolyte leakage. There may be increasing risk of electric shock from strings of connected batteries. Keep containers tightly closed when not in use. If battery case is broken, avoid contact with internal components. Keep vent caps on and cover terminals to prevent short circuits. Place cardboard between layers of stacked automotive batteries to avoid damage and short circuits. Keep away from combustible materials, organic chemicals, reducing substances, metals, strong oxidizers and water. Use banding or stretch wrap to secure items for shipping.

Storage: Store batteries under roof in cool, dry, well-ventilated areas separated from incompatible materials and from activities that may create flames, spark, or heat. Store on smooth, impervious surfaces provided with measures for liquid containment in the event of electrolyte spills. Keep away from metallic objects that could bridge the terminals on a battery and create a dangerous short-circuit.

Charging: There is a possible risk of electric shock from charging equipment and from strings of series connected batteries, whether or not being charged. Shut-off power to chargers whenever not in use and before detachment of any circuit connections. Batteries being charged will generate and release flammable hydrogen gas. Charging space should be ventilated. Keep battery vent caps in position. Prohibit smoking and avoid creation of flames and sparks nearby. Wear face and eye protection when near batteries being charged.

SECTION 8 – EXPOSURE CONTROLS AND PERSONAL PROTECTION

Ingredients:	OSHA PEL	ACGIH	US NIOSH	Quebec PEV	Ontario OEL	EU OEL
Lead, inorganic	0.05	0.05	0.05	0.05	0.05	0.15 (b)
Tin	2	2	2			
Copper	1	1	1	1	1 (a)	0.1 (e)
Sulfuric Acid	1	0.2	1	1	0.2	0.05 (c)
Polypropylene	N.E.	N.E.	N.E.	N.E.	N.E.	N.E.

NOTES:

***Ingredients listed are representative of a typical industrial battery. Consult individual manufacturer's SDS for information relating to a specific battery.**

(a) As dusts/mists (b) As inhalable aerosol (c) Thoracic fraction (d) Potential occupational carcinogen

(e) Based on OEL's of Austria, Belgium, Denmark, France, Netherlands, Switzerland, & U.K.

(f) Based on OEL of Belgium (g) Based on OEL of Netherlands

N.E. = Not Established

PEL's for individual states may differ from OSHA PEL's. Check with local authorities for the applicable state PEL's. OSHA - Occupational Safety and Health Administration; ACGIH - American Conference of Governmental Industrial Hygienists; USNIOSH - National Institute for Occupational Safety and Health.

Engineering Controls (Ventilation):

Store and handle in well-ventilated area. If mechanical ventilation is used, components must be acid-resistant. Handle batteries cautiously, do not tip to avoid spills. Make certain vent caps are on securely. If battery case is damaged, avoid bodily contact with internal components. Wear protective clothing, eye and face protection, when filling, charging or handling batteries. Do not allow metallic materials to simultaneously contact both the positive and negative terminals of the batteries. Charge batteries in areas with adequate ventilation. General dilution ventilation is acceptable.

Respiratory Protection (NIOSH/MSHA approved):

None required under normal conditions. When concentrations of sulfuric acid mist are known to exceed PEL, use NIOSH or MSHA-approved respiratory protection.

Skin Protection:

If battery case is damaged, use rubber or plastic acid-resistant gloves with elbow-length gauntlet, acid-resistant apron, clothing and boots.

Eye Protection:

If battery case is damaged, use chemical goggles or face shield.

Other Protection:

In areas where water and sulfuric acid solutions are handled in concentrations greater than 1%, emergency eyewash stations and showers should be provided, with unlimited water supply. Chemically impervious apron and face shield recommended when adding water or electrolyte to batteries. Wash hands after handling.

SECTION 9 – PHYSICAL AND CHEMICAL PROPERTIES

Properties Listed Below are for Electrolyte:			
Boiling Point:	210 - 245° F	Specific Gravity (H ₂ O = 1):	1.215 to 1.320
Melting Point:	N/A	Vapor Pressure (mm Hg):	10
Solubility in Water:	100%	Vapor Density (AIR = 1):	Greater than 1
Evaporation Rate: (Butyl Acetate = 1)	Less than 1	% Volatile by Weight:	N/A
pH:	~1 to 2	Flash Point:	Below room temperature (as hydrogen gas)
LEL (Lower Explosive Limit)	4.1% (Hydrogen)	UEL (Upper Explosive Limit)	74.2% (Hydrogen)
Appearance and Odor:	Manufactured article; no apparent odor. Electrolyte is a clear liquid with a sharp, penetrating, pungent odor.		

SECTION 10 – STABILITY AND REACTIVITY

Stability: Stable X Unstable

This product is stable under normal conditions at ambient temperature.

Conditions to Avoid: Prolonged overcharge at high current; sources of ignition.

Incompatibilities: (materials to avoid)

Electrolyte: Contact with combustibles and organic materials may cause fire and explosion. Also reacts violently with strong reducing agents, metals, sulfur trioxide gas, strong oxidizers, and water. Contact with metals may produce toxic sulfur dioxide fumes and may release flammable hydrogen gas.

Lead Compounds: Avoid contact with strong acids, bases, halides, halogenates, potassium nitrate, permanganate, peroxides, nascent hydrogen, and reducing agents.

Arsenic Compounds: Strong oxidizers; bromine azide. NOTE: Hydrogen gas can react with inorganic arsenic to form the highly toxic gas – arsine.

Hazardous Decomposition Products:

Electrolyte: Sulfur trioxide, carbon monoxide, sulfuric acid mist, sulfur dioxide, hydrogen sulfide.

Lead Compounds: Temperatures above the melting point are likely to produce toxic metal fume, vapor, or dust; contact with strong acid or base or presence of nascent hydrogen may generate highly toxic arsine gas.

Hazardous Polymerization:

Will not occur

SECTION 11 – TOXICOLOGICAL INFORMATION

Routes of Entry:

Sulfuric Acid: Harmful by all routes of entry.

Lead Compounds: Hazardous exposure can occur only when product is heated, oxidized or otherwise processed or damaged to create dust, vapor or fume. The presence of nascent hydrogen may generate highly toxic arsine gas.

Inhalation:

Sulfuric Acid: Breathing of sulfuric acid vapors or mists may cause severe respiratory irritation.

Lead Compounds: Inhalation of lead dust or fumes may cause irritation of upper respiratory tract and lungs.

Ingestion:

Sulfuric Acid: May cause severe irritation of mouth, throat, esophagus and stomach.

Lead Compounds: Acute ingestion may cause abdominal pain, nausea, vomiting, diarrhea and severe cramping. This may lead rapidly to systemic toxicity and must be treated by a physician.

Skin Contact:

Sulfuric Acid: Severe irritation, burns and ulceration.

Lead Compounds: Not absorbed through the skin.

Arsenic compounds: Contact may cause dermatitis and skin hyperpigmentation

Eye Contact:

Sulfuric Acid: Severe irritation, burns, cornea damage, and blindness.

Lead Compounds: May cause eye irritation.

Effects of Overexposure - Acute:

Sulfuric Acid: Severe skin irritation, damage to cornea, upper respiratory irritation.

Lead Compounds: Symptoms of toxicity include headache, fatigue, abdominal pain, loss of appetite, muscular aches and weakness, sleep disturbances and irritability.

Effects of Overexposure - Chronic:

Sulfuric Acid: Possible erosion of tooth enamel, inflammation of nose, throat & bronchial tubes.

Lead Compounds: Anemia; neuropathy, particularly of the motor nerves, with wrist drop; kidney damage; reproductive changes in males and females. Repeated exposure to lead and lead compounds in the workplace may result in nervous system toxicity. Some toxicologists report abnormal conduction velocities in persons with blood lead levels of 50 µg/100 ml or higher. Heavy lead exposure may result in central nervous system damage, encephalopathy and damage to the blood-forming (hematopoietic) tissues.

Carcinogenicity:

Sulfuric Acid: The International Agency for Research on Cancer (IARC) has classified "strong inorganic acid mist containing sulfuric acid" as a Group I carcinogen, a substance that is carcinogenic to humans. Per the guidance found in OSHA 29 CFR 1910.1200 Appendix F, this is approximately equivalent to GHS Category 1A. This classification does not apply to liquid forms of sulfuric acid or sulfuric acid solutions contained within a battery. Inorganic acid mist (sulfuric acid mist) is not generated under normal use of this product. Misuse of the product, such as overcharging, may result in the generation of sulfuric acid mist.

Lead Compounds: Lead is listed by IARC as a Group 2A - likely in animals at extreme doses. Per the guidance found in OSHA 29 CFR 1910.1200 Appendix F, this is approximately equivalent to GHS Category 1B.

Proof of carcinogenicity in humans is lacking at present.

Arsenic: Arsenic is listed by IARC as a Group 1 - carcinogenic to humans. Per the guidance found in OSHA 29 CFR 1910.1200 Appendix F, this is approximately equivalent to GHS Category 1A.

Medical Conditions Generally Aggravated by Exposure:

Overexposure to sulfuric acid mist may cause lung damage and aggravate pulmonary conditions. Contact of sulfuric acid with skin may aggravate diseases such as eczema and contact dermatitis. Lead and its compounds can aggravate some forms of kidney, liver and neurologic diseases.

Acute Toxicity:

Inhalation LD50:

Electrolyte: LC50 rat: 375 mg/m³; LC50: guinea pig: 510 mg/m³

Elemental Lead: Acute Toxicity Point Estimate = 4500 ppmV (based on lead bullion)

Elemental Arsenic: No data

Oral LD50:

Electrolyte: rat: 2140 mg/kg

Elemental Lead: Acute Toxicity Estimate (ATE) = 500 mg/kg body weight (based on lead bullion)

Elemental Arsenic: LD50 mouse: 145 mg/kg

Elemental Antimony: LD50 rat: 100 mg/kg

Additional Health Data:

All heavy metals, including the hazardous ingredients in this product, are taken into the body primarily by inhalation and ingestion. Most inhalation problems can be avoided by adequate precautions such as ventilation and respiratory protection covered in Section 8. Follow good personal hygiene to avoid inhalation and ingestion: wash hands, face, neck and arms thoroughly before eating, smoking or leaving the work site. Keep contaminated clothing out of non-contaminated areas, or wear cover clothing when in such areas. Restrict the use and presence of food, tobacco and cosmetics to non-contaminated areas. Work clothes and work equipment used in contaminated areas must remain in designated areas and never taken home or laundered with personal non-contaminated clothing. This product is intended for industrial use only and should be isolated from children and their environment.

SECTION 12 – ECOLOGICAL INFORMATION

Environmental Fate: Lead is very persistent in soil and sediments. No data on environmental degradation. Mobility of metallic lead between ecological compartments is slow. Bioaccumulation of lead occurs in aquatic and terrestrial animals and plants but little bioaccumulation occurs through the food chain. Most studies include lead compounds and not elemental lead.

Environmental Toxicity: Aquatic Toxicity:

Sulfuric Acid: 24-hr LC50, freshwater fish (Brachydanio rerio): 82 mg/L

96 hr- LOEC, freshwater fish (Cyprinus carpio): 22 mg/L

Lead: 48 hr LC50 (modeled for aquatic invertebrates): <1 mg/L, based on lead bullion

Arsenic: 24 hr LC50, freshwater fish (Carrassius auratus) >5000 g/L

Additional Information

- No known effects on stratospheric ozone depletion
- Volatile organic compounds: 0% (by Volume)
- Water Endangering Class (WGK): NA

SECTION 13 – DISPOSAL CONSIDERATION

Spent Batteries: Send to secondary lead smelter for recycling. Spent lead-acid batteries are not regulated as hazardous waste when the requirements of 40 CFR Section 266.80 are met. Spilled sulfuric acid is a characteristic hazardous waste; EPA hazardous waste number D002 (corrosivity) and D008 (lead).

Electrolyte: Place neutralized slurry into sealed acid resistant containers and dispose of as hazardous waste, as applicable. Large water diluted spills, after neutralization and testing, should be managed in accordance with approved local, state, and federal requirements. Consult state environmental agency and/or federal EPA.

Following local, State/Provincial, and Federal/National regulations applicable to end-of-life characteristics will be the responsibility of the end-user.

SECTION 14 – TRANSPORT INFORMATION

United States: The U.S. Department of Transportation (DOT) hazardous materials regulations (49 CFR) applicable to “Non-spillable” or Non-spillable Battery” are specified in 49 CFR 173.159a.

Proper Shipping Name: Batteries, wet, non-spillable

Hazard Class: 8

ID Number: UN2800

Packing Group: III

Labels: Corrosive

Trojan Battery Company Valve Regulated Lead Acid and AGM batteries are classified as Non-spillable and have been tested and meet the non-spillable criteria listed in CFR 49, 173.159 (f) and 173.159a (d) (1).

Non-spillable batteries are exempted from CFR 49, Subchapter C requirements, provided that the following criteria are met:

1. The batteries must be securely packed in strong outer packaging and meet the requirements of CFR 49 173.159a.
2. The batteries' terminals must be protected against short circuit
3. Each battery and their outer packaging must be plainly and durably marked "NONSPILLABLE" or "NONSPILLABLE BATTERY".

The exception from CFR 49, Subchapter C means shipping papers need not show proper shipping name, hazard class, UN number, and packing group and hazardous labels are not required when transporting a non-spillable battery.

IATA Dangerous Goods Regulations (DGR):

The shipping information is as follows:

Proper Shipping Name: Batteries, wet, non-spillable

Packing Group: N/A

Hazardous Class: 8

Label/Placard Required: Corrosive

UN Identification: UN2800

Reference IATA Packing Instruction 872 (IATA DGR 56th Edition)

Trojan Battery Company Valve Regulated Lead Acid and AGM batteries are classified as Non-spillable and have been tested and meet the non-spillable criteria listed in IATA Packing Instruction 872 and Special Provision A67. Non-spillable batteries must be packed according to IATA Packing Instruction 872. This means shipping papers need not show proper shipping name, hazard class, UN number, and packing group and hazardous labels are not required when transporting a non-spillable battery.

These batteries are excluded from all IATA regulations provided that the batteries' terminals are protected against short circuits.

Trojan Battery Company's GEL Series (VRLA) and our AGM batteries have passed the pressure differential, vibration and the crack test and meet the US DOT 49CFR173.159 (f) and IATA A67 special provisions, therefore they are designated as "non-spillable" batteries under 49 CFR 173.159a; thus, must not be marked with an identification number or hazardous label and is not subject to hazardous shipping requirements. Each battery and outer packaging must be plainly and durably marked "Non-spillable" or Non-spillable battery".

However, if the batteries are the following; TE35 Gel, 5SHP Gel, 8D Gel then they MUST be classified as UN2794 as they do not fall under the exemption listed above.

IMDG Code:

The shipping information is as follows:

Proper Shipping Name: Batteries, wet, non-spillable

Packing Group: N/A

Hazardous Class: 8

Label/Placard Required: Corrosive

UN Identification: UN2800

Reference IMDG Code Packing Instruction P003

Trojan Battery Company Valve Regulated Lead Acid and AGM batteries are classified as Non-spillable and have been tested and meet the non-spillable criteria listed in Special Provision 238. Non-spillable batteries must be packed according to IMDG Packing Instruction P003. Translates to no proper shipping name, no hazard class, no UN number, no packing group and no hazardous labels when transporting a non-spillable battery.

These batteries are excluded from all IMDG code provided that the batteries' terminals are protected against short circuits per PP16.

SECTION 15 – REGULATORY INFORMATION



California Proposition 65 Warning:

Battery posts, terminals, and related accessories contain lead and lead compounds, chemicals known to the State of California to cause cancer and reproductive harm, and during charging, strong inorganic acid mists containing sulfuric acid are evolved, a chemical Known to the State of California to cause cancer. Wash hands after handling.

UNITED STATES FEDERAL REGULATIONS:

EPCRA Sections 302, 304, 311 & 312

Industrial lead-acid batteries, such as those used in forklifts, do **NOT** meet the OSHA definition of an "article" (US EPA, Oct. 1998). Therefore, the lead and acid that compose these batteries must be included when determining the various thresholds for these EPCRA section regulations. The acid in lead-acid batteries is **Sulfuric Acid**, which is an Extremely Hazardous Substance (EHS). The following table outlines the applicable EPCRA Sections and their respective thresholds for **Sulfuric Acid**:

EPCRA Sections – Sulfuric Acid	Thresholds
302 - Emergency Planning Notification	TPQ $\geq$ 1,000 lbs.
304 - Emergency Release Notification	RQ $\geq$ 1,000 lbs.
311 - MSDS Reporting	*TPQ $\geq$ 500 lbs.
312 - Chemical Inventory Reporting (i.e. Tier II)	*TPQ $\geq$ 500 lbs.

***The reporting threshold for Sulfuric Acid is $\geq$ the designated TPQ or 500 lbs, whichever is less.**

The lead used in lead-acid batteries does not qualify for any OSHA or EPCRA exemptions. Lead is not an EHS, and the following table outlines the applicable EPCRA Sections and their respective thresholds for **Lead**:

EPCRA Sections - Lead	Thresholds
311 - MSDS Reporting	$\geq$ 10,000 lbs.
312 - Chemical Inventory Reporting (i.e. Tier II)	$\geq$ 10,000 lbs.

EPCRA Section 313

The reporting of lead and sulfuric acid (and their releases) in lead-acid batteries used in cars, trucks, most cranes, forklifts, locomotive engines, and aircraft for the purposes of EPCRA Section 313 is not required. Lead-acid batteries used for these purposes are exempt for Section 313 reporting per the "Motor Vehicle Exemption." See page B-22 of the [U.S. EPA Guidance Document for Lead and Lead Compound Reporting under EPCRA Section 313](#) for additional information of this exemption.

Supplier Notification: This product contains toxic chemicals that may be reportable under EPCRA Section 313 Toxic Chemical Release Inventory (Form R) requirements. For a manufacturing facility under SIC codes 20 through 39, the following information is provided to enable you to complete the required reports:

<u>Toxic Chemical</u>	<u>CAS Number</u>	<u>Approximate % by Weight</u>
Lead	7439-92-1	73
Sulfuric Acid/Water Solution	7664-93-9	25
Tin	7440-31-5	<1

TSCA:

TSCA Section 8b – Inventory Status: All chemicals comprising this product are either exempt or listed on the TSCA Inventory.

TSCA Section 12b (40 CFR Part 707.60(b)) No notice of export will be required for articles, except PCB articles, unless the Agency so requires in the context of individual section 5, 6, or 7 actions.

TSCA Section 13 (40 CFR Part 707.20): No import certification required (EPA 305-B-99-001, June 1999, Introduction to the Chemical Import Requirements of the Toxic Substances Control Act, Section IV.A)

RCRA: Spent Lead Acid Batteries are subject to streamlined handling requirements when managed in compliance with 40 CFR section 266.80 or 40 CFR part 273. Waste sulfuric acid is a characteristic hazardous waste; EPA hazardous waste number D002 (corrosivity) and D008 (lead).

SECTION 16 – OTHER INFORMATION

NFPA Hazard Rating for sulfuric acid:

Flammability (Red) = 0

Health (Blue) = 3

Reactivity (Yellow) = 1

Sulfuric acid is water-reactive if concentrated.

Distribution into Quebec to follow Canadian Controlled Product Regulations (CPR) 24(1) and 24(2). Distribution into the EU to follow applicable Directives to the Use, Import/Export of the product as-sold.

DISCLAIMER:

THE INFORMATION ABOVE IS BELIEVED TO BE ACCURATE AND REPRESENTS THE BEST INFORMATION CURRENTLY AVAILABLE TO US. HOWEVER, TROJAN BATTERY COMPANY MAKES NO WARRANTY OF MERCHANTABILITY OR ANY OTHER WARRANTY, EXPRESS OR IMPLIED, WITH RESPECT TO SUCH INFORMATION, AND WE ASSUME NO LIABILITY RESULTING FROM ITS USE. USERS SHOULD MAKE THEIR OWN INVESTIGATIONS TO DETERMINE THE SUITABILITY OF THE INFORMATION FOR THEIR PARTICULAR PURPOSES. ALTHOUGH REASONABLE PRECAUTIONS HAVE BEEN TAKEN IN THE PREPARATION OF THE DATA CONTAINED HEREIN, IT IS OFFERED SOLELY FOR YOUR INFORMATION, CONSIDERATION AND INVESTIGATION. THIS MATERIAL SAFETY DATA SHEET PROVIDES GUIDELINES FOR THE SAFE HANDLING AND USE OF THIS PRODUCT; IT DOES NOT AND CANNOT ADVISE ON ALL POSSIBLE SITUATIONS, THEREFORE, YOUR SPECIFIC USE OF THIS PRODUCT SHOULD BE EVALUATED TO DETERMINE IF ADDITIONAL PRECAUTIONS ARE REQUIRED.

SDS REVISION DATE: MARCH 11, 2021