

Lead Acid Battery Reporting Reference Sheet

Reporting lead acid batteries accurately is important for proper planning and emergency action for first responders. Since batteries come in different forms, it is important to determine if the batteries in a facility are eligible for reporting.

What is a consumer product (batteries)?

If the batteries are in the same form and concentration as batteries that can be accessed and purchased by the general public, then they are considered a consumer product. Batteries that are considered a consumer product are exempt from reporting requirements. This is due to the exemptions listed in [40 CFR 370.13](#).

What if my batteries are not a consumer product?

If the batteries at the facility are not a consumer product, then the facility must evaluate the amount of any Extremely Hazardous Substance (EHS) and any additional non-EHSs present in the batteries. To determine if the EHS and any additional non-EHSs should be reported on the Tier II form, the facility can aggregate the amount present in each battery.

Per [40 CFR 370.10\(a\)\(1\)](#), reporting an EHS is required if it is present at any one time in an amount equal to or greater than 500 pounds or the Threshold Planning Quantity (TPQ), whichever is lower. For example, most batteries contain the EHS sulfuric acid, which has a TPQ of 1,000 pounds. However, the reporting requirement for this EHS would be 500 pounds, as that is lower than the TPQ. For any non-EHSs present in the batteries, the reporting threshold is 10,000 pounds or more at any one time, as outlined in [40 CFR 370.10\(a\)\(2\)\(i\)](#). The TPQs for EHSs are listed in Appendices A and B of [40 CFR part 355](#) and in the [EPA's Consolidated List of Lists](#).

How do I report my lead acid batteries?

Once you have determined if the batteries meet reporting requirements, the information can be captured in two different ways.

1. Facilities may enter the aggregate amount of sulfuric acid, lead, and other components individually as Pure chemicals and upload the accompanying SDSs for each one.
2. Facilities can also report Lead Acid Batteries as a Mix while providing the components of the batteries, accompanying SDS, and total weight of all batteries.