



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

May 1, 2025

Alyssa Forkin
Transportation Analyst
TTI Power Equipment, Inc.
100 Innovation Way
Anderson, SC 29621

Reference No. 25-0012

Dear Ms. Forkin:

This letter is in response to your February 4, 2025 email and subsequent email conversation requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to placarding requirements for Class 9 hazardous materials transported by highway and rail domestically. You state that your company imports lithium ion battery-powered devices described as “UN3481, Lithium ion batteries packed with equipment, 9” in accordance with the International Maritime Dangerous Goods (IMDG) Code.

We have paraphrased and answered your questions as follows:

- Q1. Is a freight container loaded with packages of “UN3481, Lithium ion batteries packed with equipment, 9” required to display Class 9 placards for transportation within the United States even though the container is placarded to satisfy the IMDG Code requirements for vessel transportation?
- A1. No. In accordance with § 172.504(f)(9), Class 9 placards are not required for domestic transportation, including that portion of international transportation which occurs within the United States.
- Q2. Is a shipment of “UN3481, Lithium ion batteries packed with equipment, 9” that is prepared in accordance with § 173.185(c) not considered hazardous material for transportation via ground within the United States?
- A2. No. For ground transportation, lithium batteries that comply with the requirements of § 173.185(c) are not subject to certain hazard communication nor training requirements of Subparts C through H of Part 172 of the HMR, or UN performance packaging requirements. However, they are still a hazardous material and subject to other requirements in the HMR including incident reporting (*see* §§ 171.15-171.16) and safe stowage in a motor vehicle (*see* § 177.834). For your reference, I have enclosed Letter of Interpretation Reference No. 22-0017, which discusses the applicability of other relevant

Department of Transportation requirements to Class 9 hazardous materials, including the hazardous materials endorsement on a Commercial Driver's License.

Additionally, please note that the Packing Group designation was removed from lithium battery entries in the § 172.101 Hazardous Materials Table in 2015 in final rule HM-215M.¹ Updating your shipping documentation may help avoid confusion and frustration of your shipments.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dirk Der Kinderen', written in a cursive style.

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

¹ See 80 FR 1076, <https://www.federalregister.gov/documents/2015/01/08/2014-30462/hazardous-materials-harmonization-with-international-standards-rrr>.

Jones, Jessie Jane (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Wednesday, February 5, 2025 11:22 AM
To: Dodd, Alice (PHMSA)
Cc: Hazmat Interps
Subject: FW: TTI Placard Removal Issues at OICT
Attachments: 76031740688_535.pdf; 76031740688_525.pdf; 030224.pdf; 120085.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning Alice,

See the attached interpretation request. Let us know if you need anything else.

Best,
Aminah

From: Forkin, Alyssa <Alyssa.Forkin@ttigroupna.com>
Sent: Tuesday, February 4, 2025 10:08 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>; PHMSA Pipelinesafety <PHMSA.Pipelinesafety@dot.gov>
Cc: Watt, Jennifer <Jennifer.Watt@ttigroupna.com>; Ellison, Clay <Clay.Ellison@ttigroupna.com>
Subject: RE: TTI Placard Removal Issues at OICT

Some people who received this message don't often get email from alyssa.forkin@ttigroupna.com. [Learn why this is important](#)

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

Please be advised we shared to two example letters of interpretation suggested to us for the Oakland International Container Terminal. Unfortunately, they were not good enough for them and their position remains unchanged regarding placard removal.

This email is to inform you that we are requesting a letter of interpretation specifically stating TTI material is not DG on the road or rail and do not require placards. We understand this may take up to 8 weeks to receive. Please forward to the appropriate party who can assist.

Please also let us know if additional information from us is needed to fulfill this request.

Thank you,

Alyssa Forkin
Transportation Analyst
TTI Power Equipment, INC
864-883-8837



From: Forkin, Alyssa
Sent: Thursday, January 30, 2025 2:08 PM
To: infocntr@dot.gov; phmsa.pipelinesafety@dot.gov
Cc: Watt, Jennifer <Jennifer.Watt@ttigroupna.com>; Ellison, Clay <Clay.Ellison@ttigroupna.com>
Subject: RE: TTI Placard Removal Issues at OICT

Adding additional email for assistance.

Thank you,

Alyssa Forkin
Transportation Analyst
TTI Power Equipment, INC
864-883-8837



From: Forkin, Alyssa
Sent: Thursday, January 30, 2025 2:02 PM
To: infocntr@dot.gov
Cc: Watt, Jennifer <Jennifer.Watt@ttigroupna.com>; Ellison, Clay <Clay.Ellison@ttigroupna.com>
Subject: TTI Placard Removal Issues at OICT

Good afternoon,

We are having issues with the Oakland International Container Terminal refusing to remove the placards from our ocean containers. According to 49CFR 173.185 (c) (1) (iv) our product is an exception on the road and rails and are only DG on the water.

OICT is firm in their position not to remove the placards on these specific cargo/containers of ours. They require an LOI directly from the DOT stating that this is granted and OICT specifically will not be held liable. So, from the DOT and not the Shipper.

Please advise if we get some assistance with this as we have multiple containers that come into this port that need placard removal before transport.

(c) **Exceptions for smaller cells or batteries.** Other than as specified in paragraph (b)(3)(i), a portable power source containing lithium cells or batteries, or lithium cells or batteries in portable power source equipment, that meets the conditions of this paragraph is exempt from the requirements of subparts C through H of [part 172 of this subchapter](#) and the requirements in [paragraphs \(b\)\(3\)\(ii\) and \(iii\)](#) of this section, except for the limitations.

(1) *Size limits.*

- (i) The Watt-hour (Wh) rating may not exceed 20 Wh for a lithium ion battery. After December 31, 2015, each provision must be marked with the Watt-hour rating.
- (ii) The lithium content may not exceed 1 g for a lithium battery.
- (iii) Except when lithium cells or batteries are packed in quantities not exceeding 5 kg net weight, the outer container or batteries must be appropriately marked: "PRIMA FORBIDDEN FOR TRANSPORT ABOARD PASSENGER BATTERIES—FORBIDDEN FOR TRANSPORT ABOARD PASSENGER LITHIUM ION BATTERIES—FORBIDDEN FOR TRANSPORT ABOARD PASSENGER"

Thank you,

Alyssa Forkin

Transportation Analyst
TTI Power Equipment, INC
864-883-8837





DECLARATION OF DANGEROUS GOODS IN CONTAINER & CONTAINER PACKING CERTIFICATE (FOR MULTIMODAL TRANSPORT)

This form meets the requirements of SOLAR 7.6 chapter VII, regulation 5, MARPOL 73/78, Annex III, regulation 4

1 Shipper/Consignor/Sender TECHTRONIC INDUSTRIES VIETNAM MANUFACTURING COMPANY LIMITED BLOCK M1-M5 DAU GIAY INDUSTRIAL PARK, DAU GIAY TOWN, THONG NHAT DISTRICT, DONG NAI PROVINCE, VN		2 Transport document number (eg: Booking No. or B/L No.) SGNEBY828400	
		4 Shipper's reference	
		5 Freight forwarder's reference	
6 Consignee TTI OUTDOOR POWER EQUIPMENT INC. 100 INNOVATION WAY ANDERSON, SC 29621		7 Carrier (to be completed by the carrier)	
7. Notify Party SAME AS CONSIGNEE		SHIPPER'S DECLARATION I hereby declare that contents of this consignment are fully and accurately described below by the Proper Shipping Name, and are classified package, marked and labeled/placarded and are in all respects in proper condition for transport according to the applicable international and national government regulations. I undertake to hold the Carrier fully harmless and indemnify them against any and all losses, damage, and expenses resulting from the failure to comply with the above.	
8 This shipment is within the limitation prescribed for:		9 Additional handling information:	
10 Vessel/flight No. and data ONE MANHATTAN 040E	11 Port/place of loading CAI MEP	24hour Emergency Number Emergency contact US: +1-800-424-9300 International Emergency: +1-703-741-5970 CNN: 14692 Chemtrec	
12 Port/place of discharge OAKLAND	13 Destination Lathrop, CA	SHIPPER EMERGENCY CONTACT: TEL:86-13622678460 PIC: Edward CONSIGNEE 24HRS EMERGENCY CONTACT: TEL: +1 864-209-0505 PIC: Clay.Ellison	
14 Shipping marks DG Goods	Number and kind of packages: Description of goods 252 Fiberboard box (Inner) MOWER 252 Fiberboard box (Outer)	Gross mass (kg) 6375.600	Net mass (kg) Cube (m3) 5821.200 66.318

UN number: UN3481
PROPER SHIPPING NAME and TECHNICAL NAME (If Required): LITHIUM ION BATTERIES PACKED WITH EQUIPMENT
IMO/CRF class: 9
PACKING GROUP: II
UN PACKING CODE: 4G
Flash Point: Not Applicable
Other description (maine pollutant, etc): NO
Number and kind of packages
Gross mass (kgs)/Net mass (kgs)/Cube (m3)
252 CTN 6375.6 KG/ 5821.2 KG / 66.318 M3

15 Container identification No./ vehicle registration No. FDCU0596060	16 Seal number(s) VN38705AJ	17 Container/vehicle size and type 40HC	18 Tare mass (kg) 3,770	19 Total gross mass (including tare) (kg) 10,145.600
CONTAINER/VEHICLE PACKING CERTIFICATE I hereby declare that the goods described above have been packed /loaded into the container/vehicl identified above in accordance with the applicable prevision. MUST BE COMPLETED AND SIGNED FOR ALL CONTAINER/VEHICLE LOADS BY PERSON RESPONSIBLE FOR PACKING/LOADING		21 RECEIVING ORGANIZATION RECEIPT Received the above number of packages/containers/trailers in apparent good order and condition, uner stated herein: RECEIVING ORGANIZATION REMARKS :		
20 Name of company TECHTRONIC INDUSTRIES VIETNAM MANUFACTURING COMPANY LIMITED Name/status of declarant Pham Thi Xinh - OPD / Shipping Director Place and date 12-Dec-24 Signature of declarant		Hailer's name Vehicle reg. no. Signature and date	22 Name of company (OR SHIPPER PREPARING THIS NOTE) TECHTRONIC INDUSTRIES VIETNAM MANUFACTURING COMPANY LIMITED Name/status of declarant Pham Thi Xinh - OPD / Shipping Director Place and date 12-Dec-24 Signature of declarant	
 PHAM THI XINH		 PHAM THI XINH		

* DANGEROUS GOODS:

You must specify: Proper Shipping Name hazard data, UN No., packing group (we are assigned) main pollutant and deserve the mandatory requirements under acceptable national and international government regulations. For the sources of the IMDG Code see 5.4.1.1



* For the purposes of the IMDG CODE see 5.4.2 (see overleaf)

DECLARATION OF DANGEROUS GOODS IN CONTAINER & CONTAINER PACKING CERTIFICATE (FOR MULTIMODAL TRANSPORT)

This form meets the requirements of SOLAR 7.6 chapter VII, regulation 5, MARPOL 73/78, Annex III, regulation 4

1 Shipper/Consignor/Sender TECHTRONIC INDUSTRIES VIETNAM MANUFACTURING COMPANY LIMITED BLOCK M1-M5 DAU GIAY INDUSTRIAL PARK, DAU GIAY TOWN, THONG NHAT DISTRICT, DONG NAI PROVINCE, VN		2 Transport document number (eg: Booking No. or B/L No.) SGNEBY828400	
		4 Shipper's reference	
		5 Freight forwarder's reference	
6 Consignee TTI OUTDOOR POWER EQUIPMENT INC. 100 INNOVATION WAY ANDERSON, SC 29621		7 Carrier (to be completed by the carrier)	
7. Notify Party SAME AS CONSIGNEE		SHIPPER'S DECLARATION I hereby declare that contents of this consignment are fully and accurately described below by the Proper Shipping Name, and are classified package, marked and labeled/placarded and are in all respects in proper condition for transport according to the applicable international and national government regulations. I undertake to hold the Carrier fully harmless and indemnify them against any and all losses, damage, and expenses resulting from the failure to comply with the above.	
8 This shipment is within the limitation prescribed for:		9 Additional handling information:	
10 Vessel/flight No. and data ONE MANHATTAN 040E	11 Port/place of loading CAI MEP	24hour Emergency Number Emergency contact US: +1-800-424-9300 International Emergency: +1-703-741-5970 CNN: 14692 Chemtrec	
12 Port/place of discharge OAKLAND	13 Destination Lathrop, CA	SHIPPER EMERGENCY CONTACT: TEL:86-13622678460 PIC: Edward CONSIGNEE 24HRS EMERGENCY CONTACT: TEL: +1 864-209-0505 PIC: Clay.Ellison	
14 Shipping marks DG Goods	Number and kind of packages: Description of goods 252 Fiberboard box (Inner) MOWER 252 Fiberboard box (Outer)	Gross mass (kg) 6375.600	Net mass (kg) 5821.200 Cube (m3) 66.319

UN number: UN3481
PROPER SHIPPING NAME and TECHNICAL NAME (If Required): LITHIUM ION BATTERIES PACKED WITH EQUIPMENT
IMO/CRF class: 9
PACKING GROUP: II
UN PACKING CODE: 4G
Flash Point: Not Applicable
Other description (main pollutant, etc): NO
Number and kind of packages
Gross mass (kgs)/Net mass (kgs)/Cube (m3)
252 CTN 6375.6 KG / 5821.2 KG / 66.319 M3

15 Container identification No./ vehicle registration No. NYKU0723267	16 Seal number(s) VN38673AJ	17 Container/vehicle size and type 40'HC	18 Tare mass (kg) 3,830	19 Total gross mass (including tare) (kg) 10,205.600
CONTAINER/VEHICLE PACKING CERTIFICATE I hereby declare that the goods described above have been packed /loaded into the container/vehicle identified above in accordance with the applicable provision. MUST BE COMPLETED AND SIGNED FOR ALL CONTAINER/VEHICLE LOADS BY PERSON RESPONSIBLE FOR PACKING/LOADING		21 RECEIVING ORGANIZATION RECEIPT Received the above number of packages/containers/trailers in apparent good order and condition, under stated herein: RECEIVING ORGANIZATION REMARKS :		
20 Name of company TECHTRONIC INDUSTRIES VIETNAM MANUFACTURING COMPANY LIMITED		Hailer's name	22 Name of company (OR SHIPPER PREPARING THIS NOTE) TECHTRONIC INDUSTRIES VIETNAM MANUFACTURING COMPANY LIMITED	
Name/status of declarant Pham Thi Xinh - OPD / Shipping Director		Vehicle reg. no.	Name/status of declarant Pham Thi Xinh - OPD / Shipping Director	
Place and date 12-Dec-24		Signature and date	Place and date 12-Dec-24	
Signature of declarant		DRIVER'S SIGNATURE	Signature of declarant	
 <p>PHAM THI XINH</p>			 <p>PHAM THI XINH</p>	

* DANGEROUS GOODS:

You must specify: Proper Shipping Name hazard data, UN No., packing group (we are assigned) main pollutant and deserve the mandatory requirements under acceptable national and international government regulations. For the sources of the IMDG Code see 5.4.1.1

* For the purposes of the IMDG CODE see 5.4.2 (see overleaf)

Subject: DG Cargo Application

1.	Reference No.	:	SGNEBY828400
2.	Vessel Name & Voyage No.	:	ONE MANHATTAN 040E
3.	Port of Loading	:	CAI MEP, VIETNAM
4.	Port of Transhipment, if appliable	:	
5.	Port of Discharge	:	OAKLAND as all Truck (Door)
6.	No. & Size/Type of Container	:	2x40'HC
7.	Proper Shipping Name	:	Lithium ion batteries packed with equipment(including lithium ion polymer batteries)
8.	Technical Name	:	Lithium ion batteries packed with equipment(including lithium ion polymer batteries)
9.	IMO Class	:	Class 9
10.	Sub Risk, if any	:	N
11.	UN No.	:	UN3481
12.	Flash Point (in Celsius)	:	NIL
13.	EMS No.	:	F-A, S-I
14.	Marine Pollutant (Y / N)	:	N
15.	Solid / Liquid / Gas	:	Solid
16.	Liable to evolve Flammable Gases or Vapours	:	N
17.	Chemical Giving Rise to Hazard	:	N
18.	UN Packaging Code	:	4G
19.	Packing Group	:	II
	DG CARGO	:	N/A
20.	Outer Packaging - Type & Qty FDCU0596060	:	252 Fibreboard Box
	Outer Packaging - Type & Qty NYKU0723267	:	252 Fibreboard Box
21.	Inner Packaging - Type & Qty FDCU0596060	:	252 Fibreboard Box
	Inner Packaging - Type & Qty NYKU0723267	:	252 Fibreboard Box
22.	Gross Weight (kgs) FDCU0596060	:	6,375.600
	Gross Weight (kgs) NYKU0723267	:	6,375.600
23.	Net Weight (kgs) FDCU0596060	:	5,821.200
	Net Weight (kgs) NYKU0723267	:	5,821.200
24.	Limited Quantity (Y / N)	:	N
25.	24hour Emergency Phone Tel	:	24hour Emergency Number Emergency contact US: +1-800-424-9300 International Emergency: +1-703-741-5970 CNN: 14692 Chemtrec
26.	Emergency PIC	:	24hrs Shipper Emergency contact: TEL: 86-13622678460 - Pic: Edward CONSIGNEE 24HRS EMERGENCY CONTACT: TEL: +1 864-209-0505 - 'PIC: Clay Ellison

- Note:
- 1. DG application must be made at least 72 hours prior to loading.
 - 2. Any DG approval does not imply that space on subsequent connecting vessels also automatically granted.
POL must separately request for space confirmation on subsequent carriers.

DATE: December 12, 2024

Signature :



Full Name : PHAM THI XINH




中国认可
检验
INSPECTION
CNAS IB0011

运输危险性鉴定报告书

Classification and Identification Report for Transport

Page 1 of 6 Pages

No.: UN2023-5464-1

 海运 By Sea	第九类危险品 (P903) Dangerous Goods Class 9 (P903) 报告有效期 Period of validity: 2024-12-31
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样 品 名 称

锂离子电池组

OP40602VNM 标称电压: 36V 最大充电电压: 40V 6Ah 216Wh

Sample Name..... :

Li-ion battery

OP40602VNM Nominal voltage: 36V Max. charging voltage: 40V
6Ah 216Wh

委 托 单 位

东莞厚街科劲机电设备有限公司

Commissioner

TechPower Engineering(Dongguan) Company
Limited

威凯检测技术有限公司

CVC Testing Technology Co., Ltd.

运输危险性鉴定报告书

Classification and Identification Report for Transport

Ref. No.: UN2023-5464-1

Page 2 of 6 Pages

样品信息/ Sample information	
样品名称	锂离子电池组
Sample name.....	Li-ion battery
电池类别/Battery Category	锂离子电池/Lithium-ion batteries
电池型号规格/Battery Type	OP40602VNM 标称电压/ Nominal voltage: 36V 最大充电电压/ Max. charging voltage: 40V 6Ah 216Wh
外观颜色/ Appearance.....	黑色和灰色/ Black & gray
委托单位/ Commissioner information	
委托单位	东莞厚街科劲机电设备有限公司
Commissioned by	TechPower Engineering(Dongguan) Company Limited
制造商/Manufacturer information	
制造商	-
Manufacturer	GREEN PLANET DISTRIBUTION CENTRE COMPANY LIMITED
包装件信息/Package information	
包装件重量/Package weight ...	8,7kg
电池净重/ Battery net weight ..	7,8kg
电池个数/ Battery Number	4pcs
包装件尺寸/Package size	241mm*205mm*285mm
时间信息/ Date	
鉴定日期/ Inspection date.....	2023-11-30~2023-12-07
报告有效期/Period of validity ...	2024-12-31
鉴定依据/Inspection refer to	
国际海事组织《国际海运危险货物规则》(2022 版) IMO INTERNATIONAL MARITIME DANGEROUS GOODS CODE (2022 Edition)	
鉴定结论/ Conclusions	
1. 运输名称/Proper Shipping name: — Lithium ion batteries	
2. 危险性识别/ Hazards identification : — 第九类 UN3480/ Class 9 UN3480	
3. 包装符合 IMDG CODE (Amdt. 41-22) 2022 版包装导则 P903 的要求/ Package complies with the Packing Instruction P903 of IMDG CODE (Amdt. 41-22) 2022 Edition. — 包装件满足包装等级 II 的要求。/ The package meet the Packing Group II performance standards.	
签发日期: Issue Date: 2023-12-11	鉴定单位盖章 (Seal of CVC)

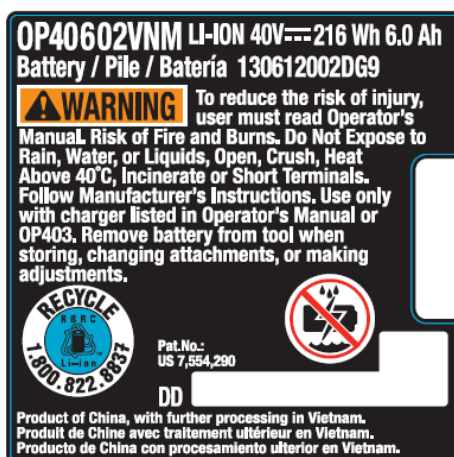
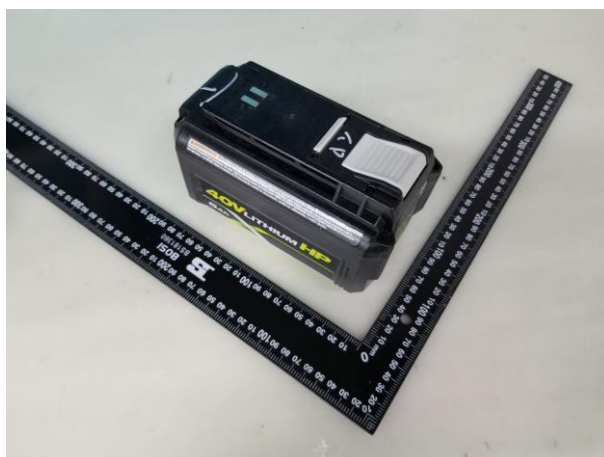
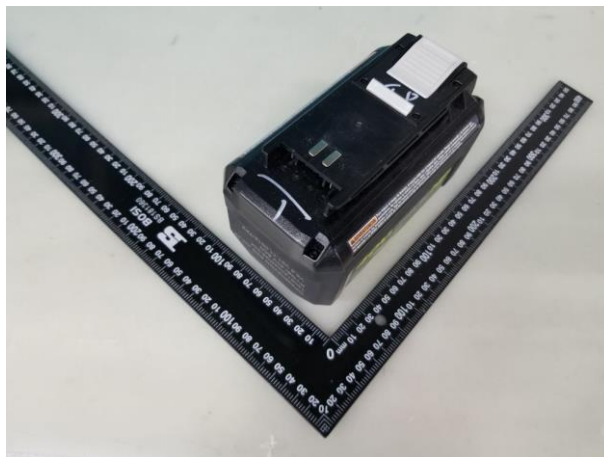
批准: 黄鲲 审核: 张思瑶 检验: 郑飞达

Approved by: 黄鲲 Reviewed by: 张思瑶 Inspected by: 郑飞达

检验结果及其他事项 Inspection results and other information	
1	本报告所述锂电池已经通过联合国《关于危险货物运输的建议书》第 38.3 节的相关测试要求。 UN38.3 测试报告及试验概要编号: <u>RZUN2023-3229 / RZUN2023-3229-TS</u> The Lithium cells/batteries listed in the report are of type proven to meet the requirements of each test in the UN Manual of Tests and Criteria Part III subsection 38.3. The UN38.3 test report and test summary numbers are : <u>RZUN2023-3229 / RZUN2023-3229-TS</u>
2	本报告所述锂电池按照《国际海运危险货物规则》(41-22) 2022 版 2.9.4 (5) 规定的质量管理体系进行制造。 Lithium cells and batteries listed in this report were manufactured under the quality management program as described in IMDG CODE (Amdt. 41-22) 2022 Edition 2.9.4 (5).
3	本报告所述锂电池具有适当的防短路措施。 Lithium cells and batteries listed in this report are properly protected so as to prevent short circuits.
4	本报告所述锂电池有适当的保护措施防止其在包装件内移位。 Lithium cells and batteries listed in this report are properly protected so as to secured against movement within the outer package.
备注: Remarks: 该报告中逗号用以代替小数点。 Throughout this report a comma is used as the decimal separator.	

样品照片
Photos of Samples

电池/ Battery(OP40602VNM 标称电压/ Nominal voltage: 36V 最大充电电
压/ Max. charging voltage: 40V 6Ah 216Wh)



包装照片
Photos of Packages

包装件/ Package



注 意 事 项

Important Notice

1. 本鉴定报告书仅对送检样品有效。
This report is valid for the tested samples only.
2. 申请人提供的样品须与实际运输货物一致。
The goods applied for shipment must be in conformity with the tested samples.
3. 本鉴定报告书无鉴定单位印章无效。
This report is invalid without the seal of CVC.
4. 本鉴定报告书无批准人、审核人及检验人签名无效。
This report is invalid without the signatures of Ratifier, Reviewer and Inspector.
5. 本鉴定报告书涂改无效。
This report is invalid if altered.
6. 本鉴定报告仅纸质版或电子版原件有效，任何形式未经许可的报告复制件均无效，包括但不限于复印件、传真件及扫描件等。
The original softcopy or hardcopy of this report is the only valid version. Any form of unauthorized copy of the report is invalid, including but not limited to photocopies, faxes and scanned documents.
7. 本鉴定报告书可以通过扫描封面二维码或登录网站 <http://www.cvc.org.cn> 进行核实。
This appraisal report can be verified by scanning the QR code on the cover or on the website <http://www.cvc.org.cn>.

地 址：中国 广州市科学城开泰大道天泰一路 3 号

Address: No.3, Tiantaiyi Road, Kaitai Avenue, Science City, Guangzhou, P. R. China.

电 话(Tel): (020)32293888

传 真(FAX): (020)32293889

邮政编码(Post Code): 510663

E-mail: office@cvc.org.cn

<http://www.cvc.org.cn>




中国认可
检验
INSPECTION
CNAS IB0011

运输危险性鉴定报告书

Classification and Identification Report for Transport

Page 1 of 6 Pages

No.: UN2023-5486-1

 海运 By Sea	第九类危险品 (P903) Dangerous Goods Class 9 (P903) 报告有效期 Period of validity: 2024-12-31
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样 品 名 称

锂离子电池组

OP40504VNM, RY36B50B, R36BTY5 Rated voltage/额定电压: 36V
Nominal voltage/标称电压: 40V 5Ah 180Wh

Sample Name..... :

Li-ion battery pack

OP40504VNM, RY36B50B, R36BTY5 Rated voltage/额定电压: 36V
Nominal voltage/标称电压: 40V 5Ah 180Wh

委 托 单 位

东莞厚街科劲机电设备有限公司

Commissioner

TechPower Engineering(Dongguan) Company
Limited

威凯检测技术有限公司

CVC Testing Technology Co., Ltd.

运输危险性鉴定报告书

Classification and Identification Report for Transport

Ref. No.: UN2023-5486-1

Page 2 of 6 Pages

样品信息/ Sample information	
样品名称	锂离子电池组
Sample name.....	Li-ion battery pack
电池类别/Battery Category	锂离子电池/Lithium-ion batteries
电池型号规格/Battery Type	OP40504VNM, RY36B50B, R36BTY5 Rated voltage/额定电压: 36V Nominal voltage/标称电压: 40V 5Ah 180Wh
外观颜色/ Appearance.....	黑色和灰色/ Black & gray
委托单位/ Commissioner information	
委托单位	东莞厚街科劲机电设备有限公司
Commissioned by	TechPower Engineering(Dongguan) Company Limited
制造商/Manufacturer information	
制造商	-
Manufacturer	GREEN PLANET DISTRIBUTION CENTRE COMPANY LIMITED
包装件信息/Package information	
包装件重量/Package weight ...	17,4kg
电池净重/ Battery net weight ..	16,3kg
电池个数/ Battery Number	12pcs
包装件尺寸/Package size	405mm*315mm*215mm
时间信息/ Date	
鉴定日期/ Inspection date.....	2023-11-30~2023-12-07
报告有效期/Period of validity ...	2024-12-31
鉴定依据/Inspection refer to	
国际海事组织《国际海运危险货物规则》(2022 版) IMO INTERNATIONAL MARITIME DANGEROUS GOODS CODE (2022 Edition)	
鉴定结论/ Conclusions	
1. 运输名称/Proper Shipping name: — Lithium ion batteries	
2. 危险性识别/ Hazards identification : — 第九类 UN3480/ Class 9 UN3480	
3. 包装符合 IMDG CODE (Amdt. 41-22) 2022 版包装导则 P903 的要求/ Package complies with the Packing Instruction P903 of IMDG CODE (Amdt. 41-22) 2022 Edition. — 包装件满足包装等级 II 的要求。/ The package meet the Packing Group II performance standards.	
签发日期: Issue Date: 2023-12-11	鉴定单位盖章 (Seal of CVC)

批准: 黄鲲 审核: 张思瑶 检验: 郑飞达

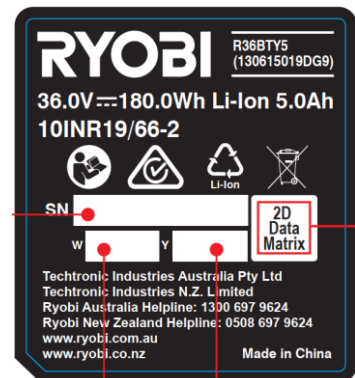
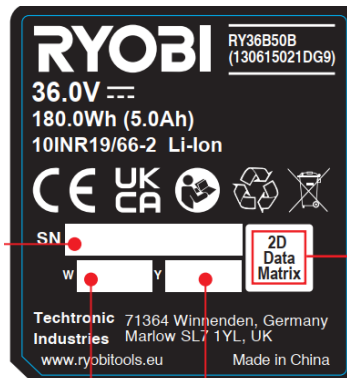
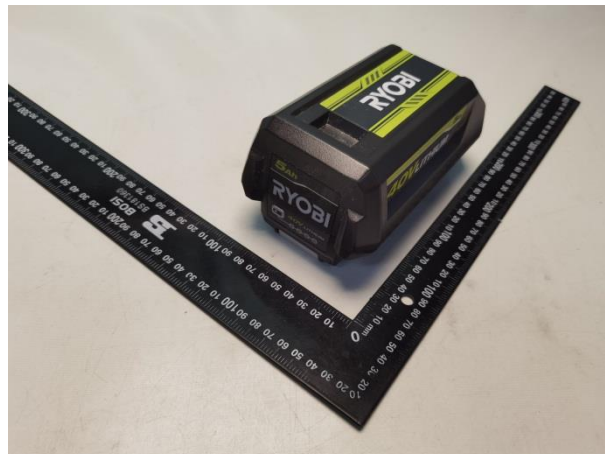
Approved by: 黄鲲 Reviewed by: 张思瑶 Inspected by: 郑飞达

检验结果及其他事项 Inspection results and other information	
1	<p>本报告所述锂电池已经通过联合国《试验和标准手册》第三部分第 38.3 节的相关测试要求。UN38.3 测试报告编号及试验概要的编号为: RZUN2023-2771 / RZUN2023-2771-TS。</p> <p>The Lithium cells/batteries listed in the report are of type proven to meet the requirements of each test in the UN Manual of Tests and Criteria Part III subsection 38.3. The UN38.3 test report and test summary numbers are RZUN2023-2771 / RZUN2023-2771-TS.</p>
2	<p>本报告所述锂电池按照《国际海运危险货物规则》(41-22) 2022 版 2.9.4 (5) 规定的质量管理体系进行制造。</p> <p>Lithium cells and batteries listed in this report were manufactured under the quality management program as described in IMDG CODE (Amdt. 41-22) 2022 Edition 2.9.4 (5).</p>
3	<p>本报告所述锂电池具有适当的防短路措施。</p> <p>Lithium cells and batteries listed in this report are properly protected so as to prevent short circuits.</p>
4	<p>本报告所述锂电池有适当的保护措施防止其在包装件内移位。</p> <p>Lithium cells and batteries listed in this report are properly protected so as to secured against movement within the outer package.</p>
<p>备注: Remarks:</p> <p>1. 该报告中逗号用以代替小数点。 Throughout this report a comma is used as the decimal separator.</p> <p>2. 该样品型号有 OP40504VNM, RY36B50B, R36BTY5 区别仅在于标签不同, 其它完全一致, 均属于同一款电池。本报告受检样品型号为: OP40504VNM The samples that have models of OP40504VNM, RY36B50B, R36BTY5 are the same battery, only different in labels. The model of tested samples is OP40504VNM in this report.</p>	

样品照片
Photos of Samples

电池/ Battery(OP40504VNM, RY36B50B, R36BTY5)

Rated voltage/额定电压: 36V Nominal voltage/标称电压: 40V 5Ah 180Wh)



包装照片
Photos of Packages

包装件/ Package



注 意 事 项

Important Notice

1. 本鉴定报告书仅对送检样品有效。
This report is valid for the tested samples only.
2. 申请人提供的样品须与实际运输货物一致。
The goods applied for shipment must be in conformity with the tested samples.
3. 本鉴定报告书无鉴定单位印章无效。
This report is invalid without the seal of CVC.
4. 本鉴定报告书无批准人、审核人及检验人签名无效。
This report is invalid without the signatures of Ratifier, Reviewer and Inspector.
5. 本鉴定报告书涂改无效。
This report is invalid if altered.
6. 本鉴定报告仅纸质版或电子版原件有效，任何形式未经许可的报告复制件均无效，包括但不限于复印件、传真件及扫描件等。
The original softcopy or hardcopy of this report is the only valid version. Any form of unauthorized copy of the report is invalid, including but not limited to photocopies, faxes and scanned documents.
7. 本鉴定报告书可以通过扫描封面二维码或登录网站 <http://www.cvc.org.cn> 进行核实。
This appraisal report can be verified by scanning the QR code on the cover or on the website <http://www.cvc.org.cn>.

地 址：中国 广州市科学城开泰大道天泰一路 3 号

Address: No.3,Tiantaiyi Road, Kaitai Avenue, Science City, Guangzhou, P. R. China.

电 话(Tel): (020)32293888

传 真(FAX): (020)32293889

邮政编码(Post Code): 510663

E-mail: office@cvc.org.cn

<http://www.cvc.org.cn>



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

NOV - 4 2003

400 Seventh St., S.W.
Washington, D.C. 20590

Mr. Steven Charles Hunt
ShipMate, Inc.
18436 Hawthorne Blvd.
Suite 201
Torrance, CA 90504

Ref. No. 03-0224

Dear Mr. Hunt:

This responds to your April 29, 2003 letter concerning hazardous materials transportation security requirements adopted under a final rule published March 25, 2003. Specifically, you ask whether the security plan requirements established in the final rule apply to shipments of Class 9 materials (e.g., Air Bag Module, 9, UN3268, III) when offered for transportation by vessel. It is your understanding that a freight container carrying a hazardous material such as an air bag module, described as an "Air Bag Module, 9, UN3268, III," must be placarded when offered for transportation by vessel even when the freight container carries only one 10-pound fiberboard box.

Your understanding is incorrect. Section 172.514(a) requires a bulk packaging containing a hazardous material to be placarded as specified in §§ 172.504 and 172.505. Section 172.504(f)(9) excepts domestic shipments of Class 9 materials from the placarding requirements. Thus, a placard is not required for domestic shipments of Class 9 materials; however, international shipments of Class 9 materials may need to be placarded in accordance with international regulations. If a CLASS 9 placard is not required for the domestic portion of transportation, the security plan requirements in Subpart I do not apply to such shipments, even if a CLASS 9 placard is required for the international portion of transportation. Note, however, that a person who offers or transports a Class 9 material in a bulk packaging having a capacity equal to or greater than 13,248 L (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids must develop and implement a security plan, irrespective of placarding requirements (see § 172.800(b)(4)).

The HM-232 final rule also includes new security training requirements. Section 172.704(a)(4) requires all hazmat employees, defined in § 171.8 of the HMR, to receive security awareness training. Thus, even though your Class 9 shipments may not be subject to security plan requirements, your hazmat employees must receive security awareness training. We have developed a computer-based security awareness CD-ROM that can be used to satisfy the security awareness training requirements in § 172.704(a)(4). The training CD-ROM is available to the public at no charge; it can be downloaded from our website (http://hazmat.dot.gov/hmt_security.htm) or ordered from our Training and Initiatives Office at 202-366-4900.

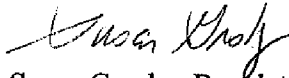


030224

172.704,
172.800

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susan Gorsky".

Susan Gorsky, Regulations Officer
Office of Hazardous Materials Standards



ShipMate, Inc.
18436 Hawthorne Blvd, Suite 201
Torrance, CA 90504
Phone: 310-370-3600
Fax: 310-370-5700
E-mail: shipmate@shipmate.com

April 29, 2003

Mr. Edward I. Mazzullo
Chief, Standards Branch (DIIM-10)
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh Street, SW
Washington, DC 20590-0001

BeHs
\$ 172,800
Security Plans
03-0224

Subj: Request for Clarification, U.S. DOT Final Rulemaking HM-232

Dear Mr. Mazzullo:

This request for Interpretation is being submitted by Steven Charles Hunt, ShipMate, Inc., on behalf of the members of the North American Automotive HazMat Action Committee (NAAHAC), herein collectively referred to as the "Petitioner."

U.S. Department of Transportation final rulemaking, HM-232, published in the Federal Register, Vol. 68, No. 57, on March 25, 2003, requires that a Hazardous Materials Security Plan be developed and detailed HM security training be provided to affected hazardous materials employees when a person who offers for transportation or transports in commerce one or more of the hazardous materials listed in subpart G of 49 CFR part 107, which includes a quantity of hazardous material that requires placarding under subpart F of part 172.

The requirements of 49 CFR §172.512 require that placards shall be affixed "...to the freight container (with) the placards required by §172.504." This implies that a freight container carrying a hazardous material such as an air bag module, described as an AIR BAG MODULE, 9, UN3268, III, must be placarded when offered for transportation by vessel even when the freight container carries only one 10-pound fiberboard box.

A strict interpretation of these provisions would require a company that offers one fiberboard box containing an air bag module in a freight container by vessel to be subject to the HM Security Plan requirements and detailed HM security training, whereas another company that offers thousands of packages in one vehicle by highway would not be subject to the requirements because of the placarding exception in 49 CFR §172.504(f)(9).

Accordingly, the petitioner requests a written interpretation or clarification on the applicability of the HM Security Plan and corresponding "detailed" HM security training requirement. Is it the intent of the RSPA to require the HM Security Plan for "larger" quantities (e.g., less than 1000 lbs in a transport conveyance) of hazardous materials listed in 49 CFR §172.504, Table 2?



Mr. Edward T. Mazzullo

April 29, 2003

Page 2 of 2

As the outcome of this interpretation will have a significant impact on the Petitioner, the Petitioner respectfully requests a reply as soon as possible. Your urgent review and response would be most appreciated. If I may be of assistance in any way, please call.

Respectfully,


Steven Charles Hunt
ShipMate, Inc.

cc: Mr. Dan Wieten/Lexus Motor Sales, U.S.A., Inc.
Ms. Claudia Meeks/Ford Motor Company
NAAHAC

Hazardous Materials Training ♦ Information Systems ♦ Compliance Inspections & Audits ♦ Shipping & Regulatory Software

** TOTAL PAGE.003 **



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

AUG 22 2012

Mr. Kenneth Kelton
Safety Director
Brothers Group, Inc.
513 East Desoto Avenue
St. Louis, MO 63147

Reference No. 12-0085

Dear Mr. Kelton:

This is in response to your letter postmarked March 21, 2012 requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to marking and placarding of a Class 9 (miscellaneous) hazardous material shipment, and hazardous material endorsement requirements on a commercial driver's license (CDL).

In your letter, you describe a shipment that consists of 72, 55-gallon drums of "UN 3082, Environmentally hazardous substances, liquid, n.o.s. (2,6-Di-tert-butylphenol), 9 (miscellaneous), PG III, Marine Pollutant," has a total weight of 34,603 pounds, and is being transported in a motor vehicle trailer from St. Louis, MO, to Houston, TX. The drums will be loaded into another container in Houston and transported by motor vehicle to the coast for eventual overseas shipment via vessel transportation. Based on a September 14, 2011 letter my agency issued under Reference No. 11-0171, you state it is your understanding that because the shipment you describe is not regulated as a hazardous material when transported domestically, your company is not required to place placards on all four sides of the trailer or container used to transport this shipment while in the United States. You further state it is your understanding that the container of drums must be placarded when offered for transportation by vessel.

Your understanding is correct. Marine pollutants transported in non-bulk packages are excepted from regulation under the HMR unless they are transported by vessel or meet a hazard class definition (see § 171.4(c)). Therefore, marine pollutants are not subject to the requirements for shipping papers, markings, labels or placards when transported by highway, rail or air. However, please note that §§ 171.22(d) and 171.25(a) provide that a hazardous material subject to the requirements of the International Maritime Dangerous Goods (IMDG) Code, that is offered or intended for eventual transportation by vessel, but not subject to the HMR may be transported in the U.S. when described, marked and labeled in accordance with the IMDG code.

In addition, under § 172.504(f)(9), a Class 9 placard is not required for domestic transportation. The HMR defines "domestic transportation" as specified in § 171.8, to include not only transportation exclusively within the United States, but also that domestic

portion of "international transportation" which occurs between places within the United States. Therefore, your driver is not required to display Class 9 placards on a vehicle that contains Class 9 hazardous material while it is within the United States but, if applicable, the vehicle may be required to be marked. Section 172.301(a)(3) requires a transport vehicle or freight container that encloses 4,000 kg (8,820 pounds) or more of a single hazardous material in non-bulk packages when the entire shipment has the same proper shipping name and is loaded at the same facility to be marked on each side and each end with the identification number of the hazardous material. Also, drums containing Class 9 material must be marked with the applicable proper shipping name and identification number and labeled with the Class 9 hazard warning label to comply with §§ 172.301(a) and 172.400(a)(5) of the HMR.

You also state it is your understanding from the Reference No. 11-0171 letter that a hazmat endorsement is not needed on a CDL when the material you described is transported domestically. Your understanding is correct. Under the HMR, a driver is not required to have a CDL with a hazmat endorsement to transport a Class 9 material by motor vehicle in the United States, even when the eventual destination of the shipment is outside of the United States. However, the HMR does require that the driver must receive hazardous materials training (see §§ 177.800(c) and 177.816). This training must include general awareness, function-specific, safety, and security awareness training as specified in § 172.704(a) of the HMR, as well as driver training in the applicable requirements of Federal Motor Carrier Safety Regulations (FMCSR; 49 CFR parts 390 through 397) and the procedures necessary for the safe operation of that motor vehicle. Training conducted to satisfy compliance with the current Federal Motor Carrier Safety Administration (FMCSA) requirements for a CDL with a tank vehicle or hazardous materials endorsement, may be used to satisfy the training requirements set forth in § 172.704 to the extent that such training addresses the training components specified in § 172.704(a). Where this training does not satisfy the HMR, the employer or self-employed person performing these tasks must provide additional training that satisfies these requirements (see § 177.816(c) and (d)). In addition, CDLs and hazardous materials endorsements are regulated by FMCSA in accordance with 49 CFR Part 383. Questions regarding FMCSA regulations should be directed to the appropriate FMCSA field office. A list of FMCSA field offices and contact information is available at "<http://www.fmcsa.dot.gov/about/contact/offices/displayfieldroster.asp>," or you may contact FMCSA at their headquarters offices in Washington, D.C., at (202) 366-6121.

I hope this satisfies your request.

Sincerely,

A handwritten signature in black ink, reading "T. Glenn Foster". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

3-21-12

Edmonson
§172.504
Placarding
12-0085

BROTHERS GROUP INC.

513 EAST DESOTO AVENUE
PO BOX 470218
ST. LOUIS, MO 63147
314 231 0805 FAX 314 231 6875

U S DOT
PHMSA Office Of Hazardous Materials Standards
Attn: PHH-10
East Building
1200 New Jersey Ave, SE.
Washington, DC 20590-0001

Dear Sir Or Madam

I am requesting a clarification for a shipment of 72 drums 34603 lbs of UN 3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, LIQUID, N.O.S.

(2,6-DI-TERT-BUTYLPHENOL) 9, III MARINE POLLUTANT

This shipment was loaded at one facility with no other product on the trailer. The shipment is going from St Louis Mo to Houston TX and from there it will be loaded on a container and taken to the coast for shipment over seas. I know it must be placard for the vessel over seas. I believe this shipment can be transported to Houston TX without placards according to 49 CFR 172.504 and I believe that 49CFR 172.301 (3) does not apply to this shipment because this is not consider a hazardous material when shipped domestically. (172-301 (3) Large Quantities Of A Single Hazardous Material In Non Bulk Packages) sometimes referred to as the 8820 lb rule. According to PHMSA Interpretation # 11-0171 the driver does not need the hazmat endorsement to transport domestically is another reason to believe that I would not be required to mark the trailer on all 4 sides. If it is decided that I need to mark the trailer does the driver then need the hazmat endorsement? Thank you for your help on this matter.

BROTHERS GROUP INC
513 EAST DESOTO AVE
ST LOUIS MO 63147
KENNETH KELTON


SAFETY DIRECTOR

314-805-5003
e-mail kkelton@brotherstransfer.com