



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

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

**MAY 13 2008**

Mr. Tom Biello  
Director, Supply Chain  
EnerSys  
2366 Bernville Road  
Reading, PA 19605

Ref. No. 08-0086

Dear Mr. Biello:

This responds to your letter requesting clarification of the packaging requirements for batteries under the International Maritime Dangerous Goods Code (IMDG Code) as authorized for use under § 171.22 of the Hazardous Materials Regulations (49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

Q1. Occasionally our company offers for international transportation, by vessel, forklift batteries that weigh approximately 2,000 lbs each. The batteries are packaged under Packing Instruction P801 of the IMDG Code. Packing Instruction P801 requires the batteries to be packaged in one of the following types of packaging: (1) rigid outer packagings; (2) wooden slated crates; or (3) pallets. Our company secures the batteries to wooden pallets with steel banding material. Does this method comply with Packing Instruction P801 of the IMDG Code?

A1. Yes. Your packaging method conforms to the third option in your question.

Q2. If we choose the second option (wooden slated crate) in Q1 to package our batteries, is absorbent material required?

A2. No, Packing Instruction P801 of the IMDG Code does not require absorbent material for any of the authorized types of packagings.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



Stevens  
S173.159  
Batteries  
08-0086

March 17, 2008

Mr. John Gale  
Chief, Standards Development  
Office of Hazardous Materials Standards  
PHMSA U.S. Department of Transportation  
Washington, DC 20590-0001

Dear Mr. Gale:

I have a few packaging questions about UN2794 Batteries, wet, filled with acid PGIII for export shipment under IMO/IMDG regulations. We manufacture forklift batteries, which are sometimes exported from the US.

The batteries are constructed in a 1/4" steel case tray which covers all four sides and the bottom. The battery is protected from short circuiting then banded (6-10 steel bands), braced and blocked to a sturdy wooden pallet. A single battery is roughly 2000 lbs, 30" high, 24" wide and 36" long.

My questions are regarding how to properly package forklift batteries. IMO packaging instructions (P801) contains three statements related to packaging; 1) Rigid outer packaging, 2) Wooden slatted crates or 3) Pallets.

Do I interpret each statement individually or collectively? If individually can I interpret a 1/4" steel cased battery banded to a pallet is acceptable? If I choose to use a wooden crate, does it need to contain absorbent material?

I work with various export packers who use a single method, either pallets or crating. Each claims their way is correct. In talking with new export packers, they are stating either is correct. I would like your clarification on this matter.

Please feel free to contact me if you need additional information.

Sincerely,

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