

July 15, 2013



RE: Schneider Electric – Information Technology Business Unit (APC)
Notes on Sealed Lead Acid Batteries in APC Battery Packs (Battery Cartridges)

Schneider Electric is committed to providing customers with APC products that are fully compliant with all regulations, international protocols, and customer standards to which they are subject. This includes providing battery cartridges (RBCs) for APC Uninterruptible Power Supplies (UPSs) that conform to the many regulatory requirements applicable to lead acid batteries found in Battery Packs. This letter declares that the batteries conform with these key international standards.

The “Non-Spillable” lead-acid batteries (UN2800) provided by Schneider Electric for use in APC branded battery pack products are:

- certified by their manufacturers as capable of withstanding the IATA/ICAO Vibration and Pressure Differential Test and that at a temperature of 55 degrees Centigrade, the electrolyte will not flow from a ruptured or cracked case and there is no free liquid to flow. Schneider Electric only authorizes the use of batteries that meet these criteria. Applicable certifications and test reports are available upon request.
- certified by their manufactures as meeting the substance limits defined by the European Union Battery Directive - 2006/66/EC (Mercury, Cadmium – see NOTE) . Schneider Electric only authorizes the use of batteries that meet these limits. APC conducts destructive and non-destructive analyses on samples of incoming batteries to confirm supplier declarations. Applicable certifications and test reports are available upon request.
- covered by the Material Safety Data Sheets (MSDS) available on the APC website (www.APC.com). This MSDS is applicable to any battery pack product that utilize lead acid battery chemistry (e.g., RBCXXX, SYBTX, SURTXXXLBP, etc.).
- packaged to protect against short-circuiting. Batteries within APC-branded UPS and in their original APC sanctioned packaging are considered securely packaged for transportation and are not considered “Dangerous Goods” under DOT, IATA and similar transportation rules. Therefore, for transportation by air, land or sea, they require no additional special handling or packaging when contained by their original packaging systems. See NOTES section for additional details.
- marked according to the applicable regulatory requirements.
- provides a statement on batteries and associated marketing materials that batteries must be recycled. In addition, We provide a process for the safe return and recycling of batteries. Typically, this includes providing locations where spent batteries can be sent or dropped

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off and then sent at our expense to responsible battery recyclers. Please note that local rules limit or define the level of battery recycling service that Schneider Electric can provide. Check the APC website (www.APC.com/recycle) for battery recycling services in your area.

If you should have any questions regarding this matter, please do not hesitate to contact me. As a customer who uses our products as components within your own designs or a purchaser of our products, you have a vested interest in our compliance with international environmental requirements. All of us at Schneider Electric greatly appreciate your continued interest in our company's products.

Sincerely Yours,



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NOTES SECTION

- **See Product Environmental Profile (ePEP) and End-of-Life Instructions for batteries and battery packs at:**

1. RBCs

http://www.apc.com/products/resource/include/techspec_index.cfm?base_sku=rbc2&tab=documentation

2. Battery Modules

http://www.apc.com/products/resource/include/techspec_index.cfm?base_sku=sybt4&tab=documentation

3. Extended Run Battery Packs

http://www.apc.com/products/resource/include/techspec_index.cfm?base_sku=SURT192RMXLBP&tab=documentation

- **List of restricted substances in Accumulators/Batteries and concentrations.**

Mercury (Hg) content less than : 5 ppm or 0.0005 % by weight

Cadmium (Cd) content less than : 20 ppm or 0.0020 % by weight

- **Battery Transportation Information - Sealed Lead Acid Battery Transportation Information**

The Department of Transportation (DOT) regulatory requirements affecting the packaging and transportation of batteries containing acid or alkali are contained in the Code of Federal Regulations, 49 CFR Section 173.159. The batteries used in APC UPSs are non-spillable wet, electric storage batteries. When shipped in the original factory packaging, new batteries are excepted from the requirements of the DOT's hazardous materials regulations because they meet the requirements of 49 CFR 173.159a. Batteries contained with UPSs are also excepted from the requirements.

A brief summary of the requirements to classify a battery as non-spillable follows:

- Batteries can be considered as non-spillable provided they are capable of withstanding a vibration test and pressure differential test (173.159(f))
- Non-spillable batteries are subject to incident reporting requirements (173.159a(b))

Notes on Sealed Lead Acid Batteries in APC Battery Packs (Battery Cartridges)
July 15, 2013, Page 3

- Non-spillable batteries are excepted from the packaging requirements of §173.159 under the following conditions: (173.159a(c))
 1. Non-spillable batteries must be securely packed in strong outer packagings and meet the requirements of §173.159(a).
 2. The battery and outer packaging must be plainly and durably marked "NON-SPILLABLE" or "NON-SPILLABLE BATTERY."
- Non-spillable batteries are excepted from all other requirements of this subchapter when offered for transportation and transported in accordance with paragraph (c) of this section and the following: (173.159a(d))
 1. (1) At a temperature of 55 °C (131 °F), the battery must not contain any unabsorbed free-flowing liquid, and must be designed so that electrolyte will not flow from a ruptured or cracked case; and
 2. For transport by aircraft, when contained in a battery-powered device, equipment or vehicle must be prepared and packaged for transport in a manner to prevent unintentional activation in conformance with §173.159(b)(2) of this Subpart. APC RBCs are packed in such a way to prevent short circuits, securely packaged, marked "NON-SPILLABLE" or "NON-SPILLABLE BATTERY", and have been tested by an independent laboratory in accordance with the DOT regulations. **Therefore, they do not require performance oriented packaging, hazardous materials markings (eg., UN number), or a hazardous materials label.**

The APC RBCs manufactured batteries listed above are also excepted from the IATA Dangerous Goods Regulations pursuant to Special provisions A48, A67, A164, A183 and Packing Instruction 872. The words "Not Restricted" and the Special Provision numbers must be included in the description of the substance on the Air Waybill as required by 8.2.6, when an Air Waybill is issued (for APC RBCs, that would be A67)

Transportation of hazardous materials by sea is governed by the IMO's International Maritime Dangerous Goods (IMDG) Code. Under the IMDG Code, in order to be classified as a non-spillable lead acid battery and excepted from sea transportation regulations, the battery must meet the requirements of Special Provision 238.1 (which contains the Vibration and Pressure Differential Tests referenced above) AND the requirements of Special Provision 238.2 noted below.

IMDG Code Special Provision 238.2 – Non-spillable batteries are not subject to the provisions of this [IMDG] Code if, at a temperature of 55° C, the electrolyte will not flow from a ruptured or cracked case and there is no free liquid to flow and if, when packaged for transport, the terminals are protected from short circuit. APC batteries listed above are excepted from IMDG regulations pursuant to the requirements above.

This notice is to clarify to shippers and transporters that APC RBCs are packaged and marked in accordance with 49 CFR 173.159a and are determined to be in compliance with DOT HMR49 Non-Hazardous Materials, the International Air Transportation Association (IATA), Special Provisions S.P. A48, A67, A164, A183 & Packaging Instruction 872 and IMDG S.P. 238.1 & 238.2. Therefore, these batteries are not restricted for shipment by air, sea or ground and are exempted from the hazardous material category. Please ensure that you follow the requirements of DOT, IATA and IMDG to ensure these exceptions remain applicable.