A. Effective date: 2012/03/06

B. Purpose – To document the procedure for recording battery movement through the facility. Batteries are classified as a Universal Waste. In addition they must be managed as Hazardous Material. As such, their movement and handling must be documented to insure that excessive quantities are not accumulated, or the one year limit on accumulation is not violated.

C. This procedure applies to the [redacted] and includes all of [redacted] employees.

D. Terms and definitions

1. Occupational Health and Safety Management System (OHSMS) - Enables an organization to control its OHSMS performance and minimize risks to personnel and other interested parties who could be exposed to Hazards associated with its activities.

2. Environmental Management System – represents a commitment to the prevention of pollution through implementing responsible material handling procedures, selecting qualified downstream processors to handle materials leaving our facility, performing downstream due diligence on our entire downstream processor network, adhering to strict regulatory compliance and detailed record keeping practices.

3. Quality Management System – Controls the processes and activities of the organization to ensure consistent performance and customer satisfaction.
4. **Interested Parties** - all those individuals who interact with customers, vendors, contractors, and anyone else who may be impacted by the organization’s Environmental Management System or its Health and Safety System.

5. **Hazard** - A hazard is a situation that poses a level of threat to life, health, property, or environment. Most hazards are dormant or potential, with only a theoretical risk of harm; however, once a hazard becomes 'active', it can create an emergency situation.

6. **Environmental Aspects** – Also known as Focus Materials are those materials which may have an adverse impact to the environment, or the Health and Safety employees, or interested parties, if mishandled.

7. **Daily Work Instructions** – may be issued to supplement SOPs, SPs, and Forms to provide detailed instruction for a specific task, or project. Daily Work Instructions may take temporary precedence over SOPs, SPs, and Forms in unusual circumstances.

### E. Responsibilities

1. **Management Team** – is responsible to maintain an Environmental Management System and an Organizational Health and Safety System which exercises due diligence in identifying materials processed at their facilities. These systems must insure that there is no adverse impact to the environment, its employees, or interested parties.

2. **Environmental and Health and Safety Managers** - will insure that processes and procedures are created and maintained to protect the environment as well as the employees and interested parties. They will also insure that the system adapts to changes in the environment, or business model by implementing temporary, or permanent changes to the Management System.

3. All employees – must abide by the processes and procedures provided to insure a safe workplace which does not damage the environment. They must also insure that they are alert to potential hazards which those hazards are communicated to management.

4. All Interested Parties – must respect the processes and procedures governing their conduct at facilities, or in any

### F. Procedure

Controlled copy is maintained electronically, printed versions are not considered controlled. This copy is valid only if revision number matches that of the Controlled Document. Refer to form 1.32.XX for the current revision of this document.
1. The Battery Coordinator will gather batteries from Sorting, Teardown, and any other area which may have accumulated them.

2. After sorting the batteries by type, the results should be recorded on Form 7.23.XX – Battery Control Log.

3. This form captures the following:

   a. Battery Type: The type of each battery gathered.
   b. Date received – The date they were gathered
   c. Weight: weight of the battery type being reported.
   d. Existing Accumulation Date: The accumulation date recorded on the appropriate container for that type of battery.

   NOTE: IF THE ACCUMULATION DATE IS APPROACHING ONE YEAR THE WAREHOUSE MANAGER MUST BE NOTIFIED.

   e. Ready Date: The date the batteries were packaged and ready to ship.
   f. Ship Date: The actual ship date of the recorded battery type.
   g. Comments: Any comments such as source of the batteries etc.

G. Attachments – None

H. Safety Considerations – Gloves and Safety Glasses must be worn whenever batteries are handled.

I. Quality Considerations – In addition to the safety aspects, the Quality Management System requires appropriate record keeping as prescribed by the U.S. E.P.A. and the states of California