



Batteries and Tier II Applicability

With 2018 coming to a close, we are quickly approaching the beginning of another busy reporting year. With that being said, how familiar are you with the March 1st Tier II reporting requirements? Whether you are a small distribution center or the largest manufacturing facility in the United States, chances are you may be failing to accurately assess your facility's Tier II applicability. In brief, Tier II is a hazardous substance storage reporting that notifies both state and local authorities of potentially hazardous materials that facilities are storing onsite over threshold.

The three questions below may help you catch a common reporting mistake. If you answer "yes" to the questions, it is highly likely that your facility needs to report the extremely hazardous substance (EHS), sulfuric acid, for Tier II reporting.

1. Are forklifts, pallet jacks or lift trucks operated at your facility?
2. Are any of the above listed industrial equipment battery powered?
3. Is more than one industrial sized battery present onsite at any one time?

The EPA has established lower reporting thresholds for EHSs, such as sulfuric acid. Therefore, simply having three lead-acid batteries onsite could cause the facility to exceed the 500 lb. reporting threshold.

Be aware: For those of you located in New York City, California, Oregon, Denver or Las Vegas, your facility will most likely need to report sulfuric acid storage even if you only store one lead-acid battery onsite!