



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

APR 2 1999

Mr. Steve Farrar
National Technical Systems
National Ordnance, Munitions
and Environmental Test Center
P.O. Box 3315
East Camden, AR 71701

Ref. No. 99-0042

Dear Mr. Farrar:

This is in response to your letter of February 10, 1999, requesting clarification on the requirements for lithium batteries under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180). Specifically you ask whether a 32 volt lithium battery must be subjected to the tests in the UN Manual of Tests and Criteria, specifically paragraph 38.3.4.3.2.2.3.

The answer is no. A lithium battery that exceeds the referenced nominal voltage is not subject to those tests. Such a battery would have each cell tested rather than the entire battery.

I hope this information is helpful.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



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Q9-0042

FAX Transmittal

DATE: FEBRUARY 10, 1999
COVER PLUS: 1
FROM: STEVE FARRAR
TO: HAZMAT HOTLINE
COMPANY: DOT
FAX NUMBER: 202.366.8700



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MESSAGE: NEED SOME HELP UNDERSTANDING LITHIUM BATTERY TESTING REQUIREMENTS FROM THE UN RECOMMENDATIONS ON DANGEROUS GOODS, ST/SG/AC.10/11/REV. 2.

PARA. 38.3.4.3.2.2.3: OUR COMPLETE BATTERY IS 32 VOLTS. OUR UNDERSTANDING OF THE UN SPECIFICATION IS THAT WE DO NOT NEED TO SUBJECT THE 32 VOLT BATTERY TO THE REFERENCED TEST BECAUSE ITS VOLTAGE EXCEEDS 4 VOLTS.

WE UNDERSTAND THAT WE STILL HAVE TO MEET THE TEST REQUIREMENTS FOR THE INDIVIDUAL LITHIUM CELLS.

WE ARE AT A STAND STILL UNTIL WE CAN GET THIS ANSWERED. IF DOT CANNOT PROVIDE THE INFORMATION I'M REQUESTING, PLEASE CALL AND LET ME KNOW.

PLEASE CALL IF YOU HAVE ANY QUESTIONS.

THANKS!!