

From: [Jeff Bagnall](#)
To: [WIND Cory Ann * DEQ](#)
Subject: Forklift Battery - DOD - Class I and II
Date: Thursday, June 8, 2023 8:25:14 AM
Attachments: [image001.png](#)
[image002.jpg](#)

Hello Ms. Wind,

My name is Jeff Bagnall – I work for Star-Tam Inc. – San Leandro California.

I will try to be brief.

E-Mission Control – Sacramento Ca. asked that I contact you with some of my experience selling and servicing forklift batteries.

Star-Tam Inc has been in business for 57 years...and I have worked in the industry for 25 years.

E-Mission mentioned DEQ was suggesting that a standard DOD (depth of discharge) is 20%. In my experience this is a very conservative number and is too low as an average. The DOD is much higher in real life applications.

I would agree that not all forklifts are being used and depleting the battery fully...but for most purposes batteries are being depleted 50%-70% EVERY Day (5 days a week – sometimes 7). If forklifts are only being utilized to 20% DOD what happens in the next forklift purchase cycle – would be determined that either the application has too many lifts OR the application can utilize another size battery (possibly). A 20% DOD is not the norm.

Ultimately – I see DOD of 60%-70% on a regular basis.

If you would like - I would be happy to discuss at your convenience.

Kindest,

Jeff Bagnall

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