

Critical Materials Recovery, LLC

Hello,

I operate an alkaline battery recycling facility. I believe my company's perspective can be helpful for the implementation of this program.

First, I want to voice confidence in Call2Recycle (C2R) as a potential stewardship organization to implement this battery program in Washington. I am familiar with and confident in C2R's effectiveness in implementing these types of programs.

Specific comments I have on the rulemaking include:

1) The requirements for annual reporting include providing a description of the recycling process used (RCW 70A.555.090(1)(d) and (m)). We request Ecology ensure in the rulemaking that general descriptions are appropriate to ensure processors are not required to release proprietary information in order to participate.

2) We suggest that, should it be considered, there be no requirement for reporting of battery weights collected or processed by the format (small, medium, or large) and only by chemistry. This is because the separation of these formats is generally not a consideration during the collection, handling, or processing of batteries and, if it were required, it would create an otherwise unnecessary additional expense and burden to sort batteries by these formats. This would increase the costs of implementing the program without apparent value-adding results.

3) We support the requirement that processing facilities participating in this program determine and report to the BSO a Recycling Efficiency Rate (RER) for each chemistry that they process and, further, that it require a 3rd party Professional Engineer (PE) to approve. This will help ensure that responsible and effective recyclers can be prioritized to receive material collected under this program. Higher RERs may come with higher costs. Any consideration of cost when approving processing facilities should also consider RER. Requiring RERs to be reported should not lead to the necessity of processors reporting proprietary methods or information. Such information could be shared directly with the approving PE as needed but should not be released into the public domain.

Thank you for the opportunity to comment.

Jesse McCullough
Critical Materials Recovery, LLC