

Denver Brown

Dear Chris Fredley, Megan Warfield, and the Washington State Department of Ecology,

Before I begin, I would like to express my support for this program. I am in avid support because I can already see how a significant step towards managing battery waste can also contribute to the larger goal of protecting our environment. When batteries are improperly disposed they can leak dangerous chemicals, including battery acid, into the environment, which can cause severe damage. I hope this program and new law will be an effective solution to battery waste in Washington State and will serve as a role model for the rest of the country to follow.

Firstly, I would like to talk about the accessibility of these collection sites, as the way they are described might be impractical. As stated in the meeting, for portable batteries, there must be a collection site within a 15-mile radius for 95% of WA residents, and for medium format batteries, there must be 25 permanent collection sites and one site in each county with more than 200,000 people. This could become illogical, especially for collection sites handling portable batteries in less populated rural areas, as establishing these collection sites would be expensive, and not as useful because of the lack of people around them. Solutions to this could vary, but my suggestion would be to think about implementing mobile collection units, which could help serve these areas with fewer people without the need for a permanent collection site, therefore being more efficient and cutting down costs.

Speaking of costs, this program seems like it will be quite expensive, especially with all the collection site requirements. I am curious how costs will be covered in areas that aren't as profitable. Also, relying on producers alone may not entirely be sustainable. A downside to relying on producers only to fund this program might result in an increase in battery prices for customers. If possible, a more balanced and sustainable source of funding could come from the state or other places such as private partnerships. While this might not be the right thing for me to write feedback on, I couldn't help but comment my thoughts on this, as it caught my attention.

Ending the topic of collection sites, I would like to talk about the requirement of terminating non-compliant collection sites. While it is important to make sure collection sites are following the correct protocols and keeping the environment safe, this could lead to a disruption in service as well as an inconvenience for residents who rely on that specific collection site. There are other possible approaches to this instead of termination, which may include receiving additional resources from the state or other institutions or training more operators/authorized personnel for that collection site. This approach will eliminate the inconvenience for residents in surrounding areas needing to dispose of batteries and will also be more effective and ensure continuity in service.

Lastly, I would like to mention the inclusion of all battery types, more specifically, the batteries used in medical devices and non-removable batteries. I know that there would be some difficulties in recycling and properly managing batteries that aren't listed in the covered batteries, but if this program were to include all battery types, that would greatly improve the environment. This wouldn't need to happen right away, but it would be a good idea to implement in the future.

Thank you again for all the work you guys do, and I appreciate your time for considering my

feedback. I hope together we can continue to better the environment inside of Washington State.

Sincerely,
Denver Brown