

Call2Recycle (Carin Stewart)

We are a non-profit battery stewardship organization and we collect batteries across the United States. And I first want to thank the department for providing, doing all the work and providing these draft comments and hosting this public hearing. We also will provide formal written comments, but for brevity I will just mention the two most concerning comments that will be submitted.

The first is information on how to handle non-covered batteries. There are two sections that require the BSO to describe to collection sites how they will deal when they receive batteries that are not covered batteries, and there's no further clarification on what that means. Our concern is that the BSO does not have the expertise nor the authority to inform all collection sites how to handle every single battery they might encounter. Nor, you know, do we have the ability or the authority to inform them as to what to do with especially items that are not easily removable because there is no solution at the moment. So our recommendation is either to limit that to recalled batteries or the department can inform the BSO on how we should instruct those collection sites and we will pass that information along.

My second comment is dealing with the marking. I think the majority of the marking makes sense. I think it's going to be easily included in most of the manufacturers' marking for now. The one item that I will bring up is the requirement to mark batteries with elemental names or elemental symbols from the periodic table. For most batteries that will be OK, but for something that is very prevalent like an alkaline battery, that means you now mark an alkaline battery as a zinc manganese dioxide, which will be unknown to almost everybody out there. So we will provide some comments on how we can clarify that so we don't start marking alkalines as zinc manganese dioxide. So thank you again for all the hard work on this.