

Ginger Swint (Ginger Swint)

I support the intent of Washington's proposed battery stewardship program under WAC 173-905, and the department of Ecology's work to expand safe and convenient battery recycling statewide. However, I am concerned that the proposed rule does not explicitly address fire risk associated with improper storage, handling, and transportation of batteries, particularly lithium-ion batteries. Fires related to battery disposal are already occurring in recycling facilities, transfer stations, and landfills, and these risks are expected to grow as battery use increases. Incorporating explicit fire prevention and safety provisions like handling and storage guidelines, requirements for fire safe packaging, labeling, and transport of collected batteries. Training standards and reporting matrix for collection and incidents of battery fires.

Additionally, the current version of WAC 173-905 does not include any third-party indemnification language encompassing legal liability. Proposed language should state that the BSO shall indemnify, defend, and harmless any local government, collection site, and transporter or other participating entity from any losses, liabilities, damages, fines, penalties, costs and expenses. This aligns with best practices in environmental and stewardship program, where indemnification couples with insurance is often standard.