

OLYMPIC ENVIRONMENTAL RESOURCES (Paul Devine)

Olympic Environmental Resources (OER) specializes in solid waste and recycling services and provides service to many City and County recycling programs in the Puget Sound area. OER staff has worked on City and County recycling programs since 1991. Services include managing residential recycling collection events where batteries are accepted.

OER appreciates the opportunity to comment on the Battery Stewardship Program Plan.

The goal of the Battery Stewardship Program Plan should be to get as many batteries out of the waste stream and into recycling programs as possible. A program should be put in place that incentivizes collectors to collect as many batteries as possible. Participants should not have to jump through too many hoops to participate in the program or not be fairly compensated when they do. A lot more clarification on the program is needed.

Those that fund the program - all residents in WA state - should have access to the program.

In reviewing information about the program, participants have options on how they can be involved.

One option to participate is to:

1. Become a program collection site. Battery stewardship programs must use as a collection site for covered batteries any...municipality...that meets the criteria for collection sites in the approved plan, upon the submission of a request by the entity to the battery stewardship organization to serve as a collection site. Local governments acting as collection sites will have demonstrable costs paid for by The Battery Network.

Cities should be able to use their existing Recycling Collection Events as their collection sites. Cities typically host one or two recycling events a year. Cities should also be able to hire a contractor to provide battery collection services and those costs should be eligible for reimbursement in this program.

Another City options is:

2. Continue to collect batteries without becoming a program collection site.

Local governments can collect batteries at own expense, however they must also meet the standards established in the Program Plan, provide collected batteries to The Battery Network or arrange transportation to an approved facility in the Program Plan, and report all information necessary for The Battery Network to fulfill reporting obligations in plan.

Some small cities may not be able to generate the volume of batteries needed to meet the program requirements. Those cities should be able to combine their batteries with other local cities to participate with one City taking the lead.

In learning more about the new battery stewardship program, it appears that it could be streamlined

to better respond to the needs of the participants. The reimbursement of costs should be competitive. OER agrees with City of Seattle staff that rates of reimbursement may be too low. City of Seattle staff prepared a letter addressing a number of issues regarding the new program. These issues are similar to the issues faced by OER clients and should be addressed.