

Chris Pfaff

As I read through this proposal, I have a few questions which I will place in order as much as possible as I read this language:

- 1- With Medium and Large quantity generators, has there been consideration on compliance with the WA Fire Code, specifically Section 322
- 2 - D. Retail Collection sites - The language on placing collection sites is vague in scope, and does not address the previously mentioned Fire Code compliance with battery storage in relation to paths of egress and proximity to Hazardous Materials by a specific distance.
- 3 - D. Retail Collection Sites/G. DDR batteries - Monitoring for battery collection at retail locations does not appear to have extensive monitoring for DDR batteries as the battery collection area may be "monitored by personnel on a regular and defined basis" This can easily lead to a DDR battery being placed in a high hazard area and not being identified until a long time later. Additionally, if a retail location identifies a DDR battery, they are to call the Battery Network, and within 2 days will receive an appropriate container, and will need to "isolate" the battery until said packaging arrives. This leads to a potentially dangerous situation at a retail facility for up to 48 hours.
- 4 - D. Retail Collection Sites - This plan provides buffers for DDR batteries being placed in extreme heat or cold environments, but does not mention the same for intact batteries. (This is specifically called out in the DOT SP-14489)
- 5 - I. Emergency Response - It is stated to call 911 in the event of an emergency and follow responders directions. As NFPA 1010 and 470 currently do not have training standards on how to respond to specific battery incidents, will there be any training provided to the fire departments that have collection sites within their response areas?
- 6 - J. Training - Training looks to be specific to collection, packaging and transport of batteries. Is there any notes on OSHA, General Duty Clause education on the hazards, or WA L&I language of the same?
- 7 - DOT Special Permit 14489 - I see exemptions on DOT placarding of the exterior of vehicles. Will the Battery Network adjust this as early identification of a battery related incident on the highway is critical to responder and public safety? (Especially in light of the recent U.N. meetings on divisions of the DOT Class 9 placard)
- 8 - Shipping question - As the NTSB has reported that a highway or rail incident in a cargo vehicle is occurring once every two weeks on United States travel routes, has The Battery Network, Call 2 Recycle, or any associated carrier carrying disposed of batteries in The Battery Network/Call2Recycle had any incidents on the highway? What is your safety record?
- 9 - K. Recalled batteries - receiving entities are encouraged to refer to the CPSC webpage for recalled batteries, and not allow them to be disposed of at these facilities. Is this the most prudent process to achieve this objective? Would it not be more effective for The Battery Network to issue bulletins from the CPSC to entities when a recall occurs?
- 10 - K. The language on what to do when an entity receives an out of network battery is extremely vague. Unlike the more specific language for DDR batteries, entities are to work with The Battery Network for proper billing for recalled or out of scope batteries. With batteries expected to be dropped off by an individual with little to no contact, who will have to pay the bill? the entity?
- 11 - I recall in the original language, that batteries embedded in items are exempt from recycling. Does the Battery Network address these hazards? and if not, why not. Are there specific instructions to individuals that drop off a product with an integrated battery?
- 12 - D. Training & Outreach - I see outreach and training being provided to households, businesses

and institutions. Will battery safety be part of this outreach or will it just be about when to take a battery to the recycling agency?

13 - Annual Report - It is stated that the Battery Network will provide a report to WA ECY every year, will this report be made public? (Beyond having to submit a FIOA?)