



# Vermont Primary Battery Product Stewardship Plan Pursuant to 10 V.S.A. Chapter 168 Act 139

**Revised: June 2020**

*Submitted by:*

Carl Smith  
President and CEO  
Call2Recycle, Inc.  
1000 Parkwood Cir Ste. 200  
Atlanta, GA 30339  
[csmith@call2recycle.org](mailto:csmith@call2recycle.org)  
[www.call2recycle.org](http://www.call2recycle.org)

*Submitted to:*

Deb Markowitz  
Secretary  
Vermont Agency of Natural Resources  
1 National Life Drive, Davis 2  
Montpelier, VT 05620





## Table of Contents

I.	Introduction .....	1
A.	Vermont Primary Battery Law .....	1
B.	Citations .....	2
II.	Stewardship Organization .....	2
A.	Statutory Citation.....	2
B.	Call2Recycle, Inc.....	2
C.	Management and Administration.....	3
III.	Registered Manufacturers and Brands .....	3
A.	Statutory Citation.....	3
B.	Primary Battery Producers and Brands.....	4
C.	Free Collection .....	4
IV.	Collection, Convenience and Implementation.....	4
A.	Statutory Citation.....	4
B.	Collection .....	5
C.	Convenience.....	8
D.	Implementation .....	10
V.	Transportation and Recycling.....	11
A.	Statutory Citation.....	11
B.	Roles and Responsibilities.....	12
C.	Transporters.....	12
D.	Processing Facilities .....	13
E.	Safety and Compliance.....	15
F.	Training .....	15
VI.	Education and Outreach .....	17
A.	Statutory Citation.....	17
B.	Strategic Approach.....	18
C.	Phase 1: Pre-launch (October-December 2015) .....	19
D.	Phase II: Launch (January-June 2016) .....	20
E.	Phase III: Ongoing (July 2016 and Beyond) .....	21
VII.	Producer to Producer Reimbursement .....	22
A.	Statutory Citation.....	22
B.	Producer Participation and Reimbursement .....	23
VIII.	Collection Rate Performance Goals.....	24
A.	Statutory Citation.....	24



B.	Collection Rates .....	24
IX.	Annual Report and Plan Audit .....	26
A.	Statutory Citation.....	26
B.	Annual Report .....	26
C.	Plan Audit.....	27
X.	Appendices.....	28
A.	Board of directors .....	28
B.	Participating Producers.....	30
C.	Locator .....	32
D.	New Enrollment On boarding .....	33
E.	Collection materials and collaterals – new enrollment email.....	34
F.	DOT special permit (revised June 30, 2015).....	41
G.	Flow chart of battery movement from site to recycling facility.....	48
H.	Processor and sorting qualification standards.....	49
I.	R2 2013 certificate .....	52
J.	ISO 14001 certificate.....	53
K.	OHSAS 18001 certificate .....	54
L.	List of collection sites.....	55
M.	Retriev Technologies audit summary.....	64
N.	Shipping batteries instructions .....	69
O.	Sample non-compliance report .....	78
P.	BOL Wizard instructions (excerpt) .....	79
Q.	Sample marketing materials .....	82
R.	Status report of battery brands from audit not on program .....	84
S.	Excerpt from the EU battery directive .....	85
T.	R2 Certification.....	86
U.	Test Loads – Downstream Approvals.....	88
V.	Battery Solutions environmental audit package 2019.....	98



## I. Introduction

In May 2014, Vermont Governor Peter Shumlin signed a law requiring extended producer responsibility (EPR) relating to non-rechargeable, also known as primary, batteries. Vermont is the first state to require EPR for primary batteries.

Vermont HB 695 requires producers, meaning manufacturers, private labelers, or importers of primary batteries, to submit a stewardship plan to the Secretary of the Agency of Natural Resources by June 1, 2015. Retail sales of primary batteries will not be allowed after January 1, 2016, unless the battery producer has implemented an approved collection plan, or is a member of an approved stewardship organization.

### A. Vermont Primary Battery Law

The Vermont Primary Battery Law requires, by June 1, 2015, that each producer selling or offering for sale, a primary battery in the State shall individually or as part of a primary battery stewardship organization submit a Plan to the Secretary of the Agency of Natural Resources for review.

The Battery Stewardship Plan must include, at a minimum, all of the following requirements:

- (1) List of participating producers and brands, including contact information covered by the program.
- (2) Free Collection: Provision for free collection of primary batteries from consumers at the time of collection.
- (3) Collection and convenience:
  - a. Allow all retailers, municipalities and certified solid waste management facilities, who meet requirements specified in the plan, to opt to be a collection facility
  - b. Provide, at a minimum, no fewer than two collection facilities in each county that provide collection throughout the year
  - c. Provide for the acceptance from a consumer of up to 100 batteries per visit.
- (4) Description of the method that will be used to responsibly manage discarded primary batteries to ensure that the components of the discarded primary batteries, to the extent economically and technically feasible, are recycled.
- (5) List all key participants in the primary battery collection chain including collection facilities, transporters and contractors and recycling facilities. Include contact information for each.
- (6) Description of education and outreach efforts to provide notice of the program to businesses, municipalities, certified solid waste management facilities, retailers, wholesalers, and haulers. The education and outreach program shall also describe efforts to inform consumers of the free collection program for primary batteries and how to access the location of collection points.
- (7) A producer to producer reimbursement procedure that is consistent with the requirements of the law.
- (8) A collection rate performance goal for the primary batteries subject to the plan. The collection rate includes the estimated total weight of primary batteries that will be sold or offered for sale in the State by the producer or the producers participating in the primary battery stewardship plan
- (9) Description of how the Plan will be implemented in conjunction with retailers, municipalities and certified solid waste management facilities acting as collection points. Further describe how the Plan





will provide free products for setting up a collection point and for providing for the pickup of collected primary batteries at no cost to the collection point.

Within 90 days of submission of the Plan, not including the time required for public comment, the Agency shall review and make a determination whether or not to approve the Plan. The Agency shall issue a letter of approval for the Plan if it provides for the establishment of a battery stewardship program that meets the requirements noted above.

Following approval of the Plan, Call2Recycle® must implement a Program no later than January 1, 2016.

## B. Citations

To provide the appropriate framework, each section of this Plan begins with a citation(s) of the sections of the Law pertaining to it.

# II. Stewardship Organization

## A. Statutory Citation

10 V.S.A. § 7581. DEFINITIONS

(12)“Primary battery stewardship organization” means an organization appointed by one or more producers to act as an agent on behalf of a producer or producers to design, submit, implement, and administer a primary battery stewardship plan under this chapter.

10 V.S.A. § 7584. PRIMARY BATTERY STEWARDSHIP PLAN

(a) Primary battery stewardship plan required. On or before June 1, 2015, each producer selling, offering for sale, distributing, or offering for promotional purposes a primary battery in the State shall individually or as part of a primary battery stewardship organization submit a primary battery stewardship plan to the Secretary for review.

## B. Call2Recycle, Inc.

Call2Recycle, Inc., is a 501(c) 4 nonprofit public service organization organized under Delaware law. The Call2Recycle® program was created and is funded by battery and product manufacturers committed to responsible recycling.

Founded in 1994, as Rechargeable Battery Recycling Corporation (RBRC), Call2Recycle is North America’s first and largest battery stewardship program. The Call2Recycle program has operated in Vermont since its collection program launched in 1996. The Call2Recycle program collects used primary and rechargeable batteries and used cell phones.



Call2Recycle, Inc., operates under the direction of a [Board of Directors](#) (Appendix A) and includes representatives of battery manufacturers, product manufacturers, and selected outside members based on expertise and experience.

### C. Management and Administration

Call2Recycle, Inc., is responsible for the management and administration of the program. This includes, but is not limited to, the following tasks:

- Management of program communications
- An interface for the public and with parties contracted under the program
- Overall day-to-day management of the program, including liaison with other stakeholders and the Vermont government
- Collection of stewardship fees through a process which ensures confidentiality of data
- Defining and meeting the performance management targets for the program, including a plan for continuous improvement
- Ensuring compliance with all applicable federal, state and municipal requirements
- Management of contracts with the collection, sorting, processing and recycling service provider(s) and the audit functions
- Setting and adhering to operating budgets

## III. Registered Manufacturers and Brands

### A. Statutory Citation

10 V.S.A. § 7584. PRIMARY BATTERY STEWARDSHIP PLAN

- (a) *Primary battery stewardship plan required. On or before June 1, 2015, each producer selling, offering for sale, distributing, or offering for promotional purposes a primary battery in the State shall individually or as part of a primary battery stewardship organization submit a primary battery stewardship plan to the Secretary for review.*
- (b) *Primary battery stewardship plan; minimum requirements. Each primary battery stewardship plan shall include, at a minimum, all of the following elements:*
- (1) *List of producers and brands. Each primary battery stewardship plan shall list:*
    - (A) *All participating producers and contact information for each of the participating producers*
    - (B) *The brands of primary batteries covered by the plan*
  - (2) *Free collection. Each primary battery stewardship plan shall provide for the collection of primary batteries from consumers at no cost to consumers. A producer shall not refuse the collection of a primary battery based on the brand or producer of the primary battery.*



## B. Primary Battery Producers and Brands

As of the submission of this stewardship plan, 21 primary battery producers representing 70+ brands, will finance Call2Recycle's primary collection and recycling program in Vermont. These producers support Call2Recycle by paying fees based on the total weight of primary batteries sold into Vermont to cover the total cost of primary battery collections and the recycling program in the state.

Call2Recycle is funded from three Industry Steward Fees:

1. An earnest deposit paid within 30 days of signing the Call2Recycle Vermont Primary Battery Stewardship Agreement. This earnest deposit will be applied to the individual stewards' share of ongoing operational costs.
2. Budgeted start up fees, allocated based on industry steward market share by weight, will be levied to meet start-up expenses incurred for the program launch.
3. Ongoing costs will be based on sales by weight into the Vermont marketplace. On a quarterly basis, Industry Stewards will report their estimated sales into Vermont's market for the previous calendar quarter. Estimates of primary batteries sold in the state will be based on a reasonable pro rata calculation based on national sales. There will be two separate fees for lithium primary versus alkaline/carbon zinc, given the different costs associated with recycling them.

A complete listing of the stewards funding Call2Recycle's efforts in Vermont can be found in *Appendix B* or on Call2Recycle's website under the ["List of Industry Stewards"](#) section. This list includes brands and contact information for each producer.

## C. Free Collection

With funding from participating producers, Call2Recycle's collection and recycling program will be FREE to Vermont consumers. In addition, participation in Call2Recycle as a collection site, assuming the entity meets the collection site criteria listed in Section III of this plan, is open to all retailers, municipalities, and other businesses such as solid waste management facilities at no cost. No organization is required to participate as a collection site.

# IV. Collection, Convenience and Implementation

## A. Statutory Citation

*10 V.S.A. § 7584. PRIMARY BATTERY STEWARDSHIP PLAN*

*(a) Primary battery stewardship plan required. On or before June 1, 2015, each producer selling, offering for sale, distributing, or offering for promotional purposes a primary battery in the State shall individually or as part of a primary battery stewardship organization submit a primary battery stewardship plan to the Secretary for review.*

*(3) Collection; convenience. Each primary battery stewardship plan shall:*



- (A) Allow all retailers who meet requirements specified in the plan, all municipalities, and all certified solid waste management facilities to opt to be a collection facility.
- (B) Provide, at a minimum, no fewer than two collection facilities in each county in the State that provide for collection throughout the year.
- (C) Provide for the acceptance from a consumer of up to 100 batteries per visit. A collection facility may agree to accept more than 100 batteries per visit from a consumer.

(9) *Implementation. A producer or a primary battery stewardship organization shall include provisions in the plan for the implementation of the program in conjunction with those retailers, municipalities, and certified solid waste management facilities acting as collection facilities under a program. No transportation or recycling cost shall be imposed on retailers, municipalities, or certified solid waste management facilities acting as collection facilities under a program. A producer or a primary battery stewardship organization shall provide retailers, municipalities, and certified solid waste management facilities acting as collection facilities products or equipment for setting up a collection point and for providing for the pickup of collected primary batteries, including arranging for the management of those primary batteries.*

## B. Collection

Call2Recycle will provide an easy, responsible and free solution for consumer battery recycling for retailers, municipalities, and other businesses such as solid waste management facilities. The program is offered at no cost for those signing up as a collection site as well as for the public dropping off their batteries at any retail, municipal or solid waste district location. Currently, Call2Recycle has 140 rechargeable battery collection sites in Vermont that will expand to include primary batteries beginning January 1, 2016.

For both new and existing collection sites, accepting both rechargeable and primary batteries is straight forward and uncomplicated. Call2Recycle's special permit allows for both rechargeable and primary batteries to be collected in the *same* box. While the rechargeable and lithium based batteries will continue to require terminal protection per U.S. Department of Transportation (U.S DOT) regulations, alkaline primary batteries do not.

During the first year of implementation, the total number of sites serving Vermont will likely expand 30%-35% in order to meet the unique market needs of primary battery collection, address any potential convenience/ability concerns, and respond to an emerging design of sites participating in the program.

Any retailer, business, institutions, or government entity which meets the minimum collection requirements outlined below can participate as a public and/or private collection site.

Additional information can be found in section V.F.

Any retailer, business, institution or government entity which meets the minimum collection requirements outlined below will not be denied and can participate as a collection site that is open to consumers or collect batteries used internally.

- ✓ Agrees to accept up to 100 primary batteries per visit from a consumer with each battery weighing less than 4.4 pounds (2 kgs). Should a consumer drop off a large quantity of batteries, the collection site is still responsible for ensuring that all applicable chemistries have the appropriate terminal protection; these details will be explicitly covered in both training materials and "on-board" process.
- ✓ Agrees to provide contact information for individual sites



- ✓ Agrees to safely handle and ship batteries in compliance with U.S. DOT regulation.

In addition, the below considerations will be taken when adding collection sites:

- ✓ Accessibility – To ensure an optimal number of collection sites available based on the ordinance minimum requirement of two collection sites per county, other geographic considerations and population
- ✓ Cost-effectiveness – Necessary to manage cost-to-serve
- ✓ Environmental health and safety – Call2Recycle will work with companies that want to enroll to promote environmental health and safety through battery recycling

Anyone interested in becoming a collection facility can request more information online at [participation inquiry](#) or call 877-723-1297.

New and existing collection locations that are accessible to Vermont residents are listed on Call2Recycle's web and mobile phone locator (*Appendix C*). Residents can search by zip code or city and state to find a battery collection location. In addition they can select a geographical radius from 10 to 100 miles or even utilize the *Recycle on the Way* feature that allows them to provide a start and end address and then shows drop-off locations that are en route to their destination.



Call2Recycle's locator is updated nightly so that new collection sites are available right away and sites that have stopped collecting batteries are removed. To facilitate the update, sites that do not ship batteries for 6 consecutive months are automatically removed from the locator.

Utilizing an aggressive on boarding process (See *Appendix D*), Call2Recycle takes proactive measures to ensure that newly enrolled locations are active and safely participating in the battery collection program. In addition to the necessary containers to collect used batteries, collection sites are provided instructions, via training materials and direct communication, on how to properly accept and package used batteries from consumers. Once enrolled, each new site receives up to 5 check-ins (i.e., emails, phone calls, etc.) during the first year and a minimum of 2 check-ins every year thereafter.

The program's approach to collection is designed with user convenience, flexibility and safety in mind. Call2Recycle provides the necessary collection containers and collateral materials (*Appendix E*), and pays all shipping, sorting and recycling costs. All collection containers, documents and guidelines incorporate EPA Universal Waste and DOT shipping requirements. In addition, Call2Recycle's existing DOT special permit (*Appendix F*) includes the DOT requirement for primary batteries. A highly trained and dedicated Customer Service team is also available to answer any questions regarding collecting, shipping or recycling batteries.

Call2Recycle supports its customer base by utilizing a centralized fulfillment solution that ships approximately 190,000 battery collection boxes annually to 27,000 U.S. collection sites using the Call2Recycle rechargeable battery collection box program.





**Call2Recycle's box fulfillment solution manages to the following standards:**

- New collection site enrollments are processed within 3 days of receipt, and collection boxes are shipped the next business day
- Collection boxes are sent with a pre-paid return shipping label. Once the box is filled, it will be picked up by the carrier
- For collection sites using collection boxes, Call2Recycle uses an automatic replenishment process to ensure that participating collection sites always have the supplies needed for battery collections, without spending valuable time placing orders. When a filled collection box is shipped and the weight recorded by the recycling facility, a replacement order is automatically generated and then shipped the next business day. The number of boxes shipped is based on the needs of the individual site.
  - i. Information regarding the receipt of non-program and/or non-compliant materials will be captured at this time and can delay shipment of supplies. Please see section V.F for additional details
- Manual box orders can be placed by customers with a phone call to the Call2Recycle Customer Service department or via an order submission form on Call2Recycle's website. New boxes are then shipped the next business day
- Whether the order is placed manually or generated automatically, once shipped, the site contact (if email information is on file) will receive an email with tracking information
- Certificates of recycling are available upon request

**Call2Recycle's bulk shipping solution manages to the following standards:**

- New collection site enrollments are processed within 3 days of receipt and set up as a bulk shipment site
- Call2Recycle offers best practice information to sites that collect and ship large quantities of batteries
- For collection sites shipping bulk, Call2Recycle provides an on line tool to assist sites in completing a bill of lading (BOL) using Department of Transportation (DOT) approved language and United Nations (UN) numbers. The tool also allows the online scheduling of the pick up through UPS Freight. If using the online tool is not an option, Call2Recycle provides a package with detailed instruction on how to properly complete a manual BOL.
- The UPS BOL number can be used to track progress of the shipment until it reaches the final destination
- Once the shipment is received, Call2Recycle electronically captures all of the supporting documentation related to a specific shipment.
  - i. Information regarding the receipt of non-program and/or non-compliant materials will be captured at this time. Please see section V.F for more information.
- Certificates of Recycling are available upon request

Call2Recycle will work with retailers, municipalities, solid waste management facilities and other businesses such as wholesalers and waste haulers to determine how they are currently collecting batteries, how they can best be assisted in their collection efforts and the best method for them to ship the collected batteries to a recycling facility for end of life management (*Appendix G*).





The program will not ship any used batteries to a sorter or processor that has not been qualified by Call2Recycle under its strict qualification standards (*see Appendix H*). Processors are selected through a fair and transparent process that requires compliance with applicable environmental, health and safety and transportation regulations. Processors will also be expected to have industry recognized recycling certification(s) and audit processes in place. Some examples are noted below:

- Review of the facility audit performed by CHWMEG (in past 2 years) or outside auditor chosen by Call2Recycle to ensure the facility is in compliance with all regulatory and performance requirements. CHWMEG, Inc. is a non-profit trade association comprised of manufacturing and other "industrial" companies interested in efficiently managing the waste management aspects of their environmental stewardship programs. Their programs are based upon their potential environmental liability related to the wastes that are inherently generated by their companies' manufacturing processes.
- Written policies outlining corporate commitment to environmental management and continuous improvement
- Complete tracking and documentation of materials in and out of facilities
- Final destination receipt and disposal documentation/certification, downstream processing material management, residual material management and residual waste management

In an added effort to ensure the highest standards, the Call2Recycle program itself, also undergoes inspections to maintain industry recognized certifications, like those listed below:

- Responsible Recycling (R2) 2013: This certifies that Call2Recycle's management practices are comprehensive; covering environmental, health and safety, and data security practices. (*Appendix I*)
- International Standardization Organization (ISO) 14001: This certifies Call2Recycle's Environmental Management Standards for the management of the collection, and the distribution to downstream processors, for the recycling of batteries and cell phones. (*Appendix J*)
- Occupational Health and Safety Advisory Services (OHSAS) 18001: This certifies Call2Recycle's Occupational Health and Safety Management System for the management of the collection, and the distribution to downstream processors, for the recycling of batteries and cell phones. (*Appendix K*)
- Basel Action Network (BAN): Call2Recycle is the first battery recycling program to be recognized as an e-Steward, by the Basel Action Network (BAN), for ensuring that the battery and electronic waste (e-waste) that the program collects and recycles is not dumped in developing countries, local landfills or incinerators. Call2Recycle joined many other responsible e-Stewards' recyclers to adhere to the strictest social and environmental standards

### C. Convenience

Call2Recycle has serviced the state of Vermont for 21 years with its free collection and recycling program for rechargeable batteries. Call2Recycle currently has drop off locations, open to consumers, for rechargeable batteries within 10 miles of 93% of the Vermont population. By the end of 2016, Call2Recycle intends that 95% of the population is within 10 miles of a public collection site. The map below (*Figure 1*) depicts the current Call2Recycle collection network which will expand to collect primary batteries upon program launch.

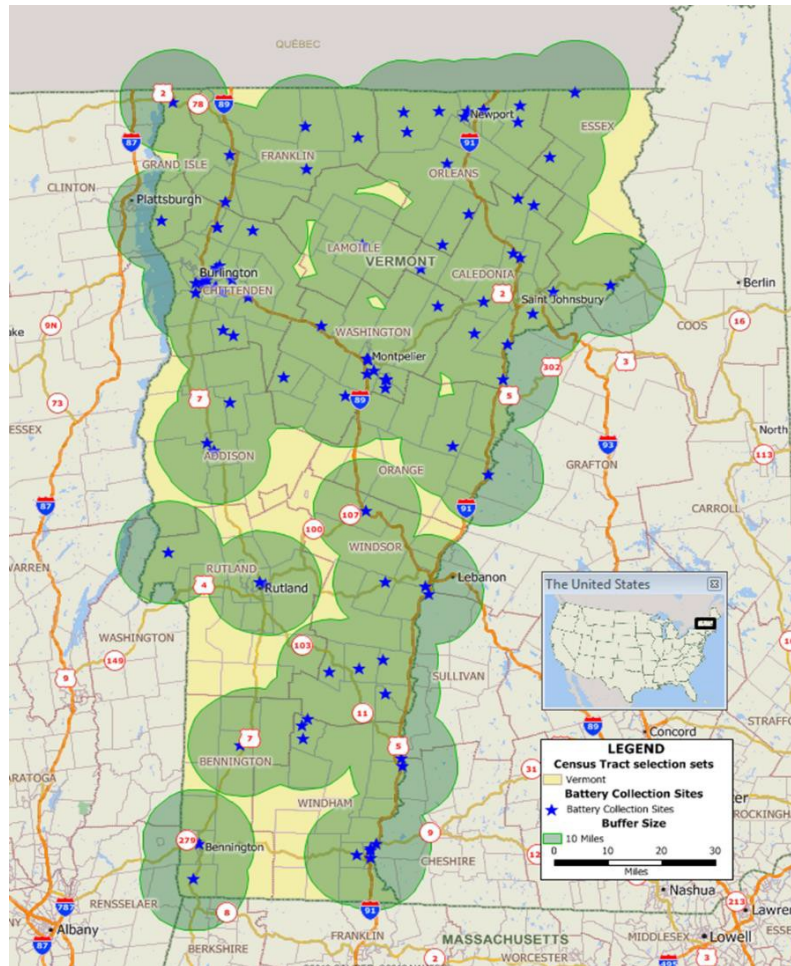


Figure 1: Active collection network in the state of Vermont for rechargeable batteries. All sites mapped are available to take batteries from consumers

Call2Recycle will begin accepting primary batteries from new and existing collection sites in Vermont on January 1, 2016. By adding new collection sites as well as expanding current sites to include primary batteries, Call2Recycle's collection network will exceed the accessibility requirements of 2 collection facilities per county as put forth in the law and shown in *Figure 2* below. The complete list of collection sites with name, location and contact information can be found in *Appendix L*.





County	Required collection facilities open to consumers	Call2Recycle collection facilities open to consumers	Number of facilities over State requirement	Additional facilities not open to consumers
Addison	2	4	2	1
Bennington	2	5	3	4
Caledonia	2	9	7	2
Chittenden	2	23	21	12
Essex	2	4	2	-
Franklin	2	5	3	3
Grand Isle	2	2	-	-
Lamoille	2	2	-	1
Orange	2	2	-	-
Orleans	2	13	11	1
Rutland	2	3	1	6
Washington	2	12	10	5
Windham	2	10	8	1
Windsor	2	8	6	2
<b>Total</b>	<b>28</b>	<b>102</b>	<b>74</b>	<b>38</b>

Figure 2: Number of collection facilities per county

In an effort to continually improve the convenience of its collection network within Vermont, Call2Recycle will evaluate the Vermont collection network on a quarterly basis and actively solicit participation when and where needed.

#### D. Implementation

Call2Recycle has the robust infrastructure to receive and recycle primary batteries. The established collection network for rechargeable batteries is a great starting point for a successful implementation. However, having a committed network to expand to include primary batteries is critical.

In addition to capitalizing on the existing network, Call2Recycle will take proactive measures to increase the number of collection sites in government entities (local, county, state, federal, solid waste districts) and retail businesses as well as in geographical areas to ensure the recycling of batteries is as convenient as possible to Vermont consumers.



This will be done through the following methods:

1. Direct contact/meetings with Vermont Waste Districts
2. Work through the Vermont Retail & Grocers Association to target locally owned retailers. Call2Recycle will not target those retailers that are already working through their local Waste District
3. Contact national retailers with stores or franchises in Vermont
4. Direct contact with waste transporters and haulers



Call2Recycle will begin shipping supplies for facilities to collect both primary and rechargeable batteries in October 2015 to ensure site readiness as of January 1, 2016.



To ensure proper set up and implementation, Call2Recycle staff will meet, in person, with various collection sites. In addition to discussing the logistics of the program, Call2Recycle staff will review the various promotional tools available to collection sites to help raise program awareness.

To ensure that Call2Recycle remains transparent throughout implementation, it has established an Advisory Group consisting of a select group of obligated producers. This group will be the vehicle in which obligated producers provide feedback on the specifics of the plan and stay informed on the plan's approval status. Likewise, Call2Recycle has established a Stakeholder Group consisting of local and state officials. This group will provide feedback on portions of the plan which impact battery recycling collections and public outreach.

## V. Transportation and Recycling

### A. Statutory Citation

*10 V.S.A. § 7584. PRIMARY BATTERY STEWARDSHIP PLAN*

- (a) Primary battery stewardship plan required. On or before June 1, 2015, each producer selling, offering for sale, distributing, or offering for promotional purposes a primary battery in the State shall individually or as part of a primary battery stewardship organization submit a primary battery stewardship plan to the Secretary for review.*
- (4) Method of disposition. Each primary battery stewardship plan shall include a description of the method that will be used to responsibly manage discarded primary batteries to ensure that the components of the discarded primary batteries, to the extent economically and technically feasible, are recycled.*
- (5) Roles and responsibilities. A primary battery stewardship plan shall list all key participants in the primary battery collection chain, including:*
  - (A) The number and name of the collection facilities accepting primary batteries under the plan, including the address and contact information for each facility; and*
  - (B) The name and contact information of a transporter or contractor collecting primary batteries from collection facilities.*



(C) The name, address, and contact information of the recycling facilities that process the collected primary batteries.

## B. Roles and Responsibilities

The program plan is based on a shared responsibility model where all parties have a role to play.

### Sorting and Recycling Contractors

All sorting and recycling contractors working under this plan will comply with all business licensing and permitting requirements as well as any local, state, provincial and federal environmental safety and transportation permits and regulations, such as but not limited to, recycling, hazardous/universal waste management, storage, transportation and treatment, air quality, water quality, import/export permits and any special conditions set forth in the licenses and/or permits.

### State Government

The state government is expected, through its enforcement authority (10 V.S.A. § 8003), to enforce the law as written.

### Local Government

Local government may wish to act as collection sites for designated material with appropriate reimbursement for services provided. Participation by a local government is completely voluntary and not required under the law. However, local government plays a critical role in making connections and influencing residents.

### Consumer or End User


Consumers are responsible for delivering designated batteries to collection points.

### Call2Recycle, Inc.


Call2Recycle will develop and manage an environmentally effective program at the lowest responsible cost and will ensure the public is kept informed of program availability and activities. Call2Recycle will utilize education, outreach and promotion to influence consumer behavior.

## C. Transporters

Currently, Call2Recycle uses UPS and FedEx to transport boxes from a central fulfillment facility to its collection sites. Filled boxes are shipped to sorters using the same carriers. Call2Recycle's contracted bulk transporter is UPS Freight. All three transportation providers are members of the Environmental Protection Agency's SmartWay partnership which is committed to improving fuel efficiency and reducing greenhouse gases and air pollution from the transportation supply chain industry.

Transporter	Contact	Description of Work
	UPS Michael Edwards 215 Marvin Miller Dr. Atlanta, GA 30336 (800) 377-4877 <a href="http://www.ups.com">www.ups.com</a>	Founded in 1907, UPS a leading global provider of specialized transportation and logistics services. UPS provides primary transportation services for Call2Recycle's collection boxes outbound to its collection sites and inbound to its sorters/processors.





	<p>UPS Freight Dusty Lollis 8550 Cobb International Blvd. NW Kennesaw, GA 30152 (770) 419-9773 (Office) <a href="http://www.upsfreight.com">www.upsfreight.com</a></p>	<p>UPS Freight specializes in less-than truckload (LTL) and freight truckload shipment. UPS Freight is Call2Recycle's preferred shipper for large quantities of outbound collection boxes to collection sites and inbound bulk shipments of 500+ pounds to its sorters/processors.</p>
	<p>FedEx Ground Joel Sawyer 1675 Airport Rd. NW Kennesaw, GA 30144 (678) 591-62831 <a href="http://www.fedex.com">www.fedex.com</a></p>	<p>Founded in 1985, FedEx Ground specializes in cost-effective, small package shipping. FedEx provides secondary transportation services for Call2Recycle's collection boxes outbound to its collection sites and inbound to its sorters/processors.</p>

#### D. Processing Facilities

Call2Recycle's original approved primary battery stewardship Plan established INMETCO as the processor of lithium primary batteries collected in Vermont. In early 2019, however, INMETCO stopped accepting lithium primary batteries. Retrie Technologies subsequently became the processor of Vermont's lithium primary batteries, and has been added to the revised plan, June 2020. Call2Recycle still uses INMETCO for processing other battery chemistries that originate outside of Vermont. In addition, the Plan indicated Battery Solutions Recovery, LLC (formerly Battery Solutions LLC) as being vetted for approval as a future processor of single-use/primary batteries. Call2Recycle completed the formal vetting process and approved Battery Solutions Recovery, LLC as a battery processor.

Battery Solutions Recovery, LLC will be the main processor of used non-lithium primary batteries collected in Vermont. Lithium primary batteries collected in Vermont will be processed by Retrie Technologies.

Recycling Facility	Contact Information
	<p>Retrie Technologies 9384 Highway 22A Trail, BC V1R4W6 <a href="http://www.retrievtech.com/">www.retrievtech.com/</a></p>
	<p>Battery Solutions Recovery, LLC 7266 Kensington Rd. Brighton, MI 48116 800-852-8127 <a href="http://www.batteryrecycling.com">www.batteryrecycling.com</a>.</p>

#### Battery Solutions

The addition of Battery Solutions Recovery, LLC as a processor for Call2Recycle was based on the following qualifications:

- **Recycling Efficiency Rate (RER):** Battery Solutions Recovery, LLC has a self-reported RER of 97.98%, which exceeds INMETCO's 85% RER. Both facilities significantly exceed the prevailing global standard of



50%, as decreed by the European Union (EU). Even in Ontario, Canada, where the most stringent standard of 80% is used, both facilities exceed it.

- **Efficiency & Cost:** With Battery Solutions Recovery, LLC now providing both sorting and processing capabilities, Call2Recycle is able to achieve greater cost savings and efficiency measures, as a result of not having to transport these batteries several states away for final processing. In addition, Battery Solutions Recovery, LLC provides further efficiency as it is the only facility with optical sorting capabilities.

Batteries collected in Vermont will continue to be shipped directly to Battery Solutions Recovery, LLC where they will be recorded by site, sorted by chemistry, consolidated into truckload shipments and sent, if applicable, to Call2Recycle's qualified processing network.

Non-lithium primary batteries will be processed by Battery Solutions Recovery, LLC using a room temperature, mechanical separation process where the battery components are separated into three end products. The three end products are –

- 1) Zinc & Manganese concentrate; 2) Steel; 3) Paper, Plastic & Brass Functions

These three end products are marketed and sold by Battery Solutions Recovery, LLC to manufacturers to be used as feedstock to make new materials. Most notably, the Zinc and Manganese concentrate, is combined with other materials to ultimately manufacture a granular fertilizer. Battery Solutions Recovery, LLC does not manufacture the final end product of granular fertilizer.

## Retriev Technologies

Retriev Technologies Ltd, Trail, BC, Canada, has been a leader in battery recycling and management for 25 years, including client services, research and development, environmental compliance, and recycling best practices. The addition of Retriev as a processor for Call2Recycle was based on the following qualifications:

- **Processing Capabilities:** Retriev Technologies Ltd is currently the only remaining battery recycling processor in North America who actively accepts lithium primary batteries for recycling and materials recovery.
- **Recycling Efficiency Rate (RER):** Retriev Technologies Ltd has a self-reported RER of 56.4%, which exceed the prevailing global standard of 50%, as decreed by the European Union (EU).
- **Efficiency & Cost:** With Retriev Technologies Ltd being located in North America, utilizing them as a processor for lithium primary batteries, Call2Recycle is able to achieve greater cost savings and efficiency measures, as a result of not having to transport these batteries to Europe or Asia for final processing.

Lithium primary batteries processed by Retriev Technologies Ltd use a multi-step process. Prior to processing, the packaging is removed and the batteries are weighed and placed into liquid nitrogen. This cools the batteries thus minimizing the reactivity of the batteries during shredding and treatment. Gases or fumes liberated during shredding are controlled in a wet scrubber system and a travelling bed filter. Atmospheric emissions are monitored to ensure compliance. Soluble components of the battery that are dissolved in the solution are



precipitated from solution and recovered and processed to produce lithium carbonate. Scrap metal and plastic from the batteries is also recovered from the treatment tank. The scrap is separated into metallic and non-metallic fractions for recycle and/or disposal.

### **Audit Summaries**

Call2Recycle continuously monitors and evaluates the efficiency and quality of its downstream vendor's reclamation process as well as other potential primary battery processors. All approved vendors must continue to meet Call2Recycle's rigorous guidelines for sorting and processing. They are periodically required to submit to audits performed by CHWMEG (a non-profit association which reviews commercial facilities that treat, store, dispose, recycle or transport waste). Routinely, the program arranges for audits of vendors by major generators of batteries that want assurance that their batteries are properly disposed. All consolidation, sorting and processing facilities are open to inspection and audit. The most recent environmental audit summary for Retrie Technologies can be found in Appendix M, and for Battery Solutions Recovery, LLC in appendix V.

Call2Recycle, Inc. may employ other sorting facilities in the future as appropriate at its sole discretion.

### **Call2Recycle R2 Certification**

Call2Recycle receives Responsible Recycling (R2) certification from Sustainable Electronics Recycling International (SERI). SERI is the housing body and ANSI-accredited (American National Standards Institute) Standards Development Organization for the R2 Standard. SERI's mission is to create a world where electronics products are reused and recycled in a way that promotes resource preservation; the well-being of the natural environment; and the health and safety of workers and communities. See Appendix T for Call2Recycle's R2 Certification.

### **Call2Recycle Test Loads**

Test loads are shipments of batteries that are directed to conditionally approved processors. These processors must meet the downstream processor due-diligence standards, but do not require Call2Recycle Board Approval. Final Approval for processors receiving test loads may be granted by the President and CEO. Test Loads are exclusively for conditionally approved processors that are conducting research into new recycling processes where volumes of battery feedstock is needed for process validation, research and recycling efficiency rate (RER) calculations. Call2Recycle has developed new test load standards as of May 2020. See appendix U for Call2Recycle's *Downstream Vendor Selection Program (Work.01.08.01)*, *Downstream Vendor Questionnaire (Form.01.08.01)*, and *Desk Audit Checklist (Form.01.08.03)*.

## **E. Safety and Compliance**

Call2Recycle works closely with federal, state and provincial environmental protection agencies along with the U.S. Department of Transportation's (U.S. DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) to ensure safe collection, transportation and recycling of both rechargeable and primary batteries collected by the program.

Call2Recycle's program is designed to capture information and documentation necessary to track and report on all shipments: those from program participants to sorting/processing facilities, as well as shipments moving from sorting/consolidating facilities to processing facilities. The organization monitors each step of the shipment process from the point of origin to delivery at the final processors. Tracking covers the lifecycle of a collected battery from capturing bills of lading shipping documents to certificates of consumption, which is the





organization's verification of final destruction of materials collected by the program.

Call2Recycle's financial statements are audited by an independent CPA firm annually to ensure that fees collected have been applied to recycling and public education program costs in the U.S. and Canada. Call2Recycle has long employed, and will continue to employ, several different audit procedures to assure compliance with required laws and regulations and general efficiency, including:

- Compliance with local, provincial and federal regulatory agencies
- Recurrent monitoring of downstream documentation and periodic environmental audits of contracted sorting and processing facilities
- Certificates of recycling to program participants requiring management documentation
- Compliance and validation of environmental management certifications such as R2 2013, ISO-14001 and OHSAS 18001

## F. Training

Not only does Call2Recycle work closely with the U.S. DOT and PHMSA to ensure safe collection, transportation and recycling of batteries, it also works closely with collection sites to ensure that they, as the shipper of record, understand the requirements as well.

Educating and training collection sites on safe and compliant handling and shipping of batteries begins when new locations are enrolled, continues consistently throughout the first year and is ongoing as there are changes to Federal and State regulations, battery chemistries and as needed based on individual site needs.

Call2Recycle's website is a great resource for collection sites and consumers to obtain information and best practices, download instructional flyers or watch a video related to handling and shipping of batteries. See *Appendix N* for examples.

By January 1, 2016 the Call2Recycle website will include all battery collection information specifically for Vermont.

More particulars about training:

- Call2Recycle uses an aggressive on boarding process to ensure that newly enrolled locations are trained and actively participate in the battery collections program. Once enrolled, each new site receives up to 5 check-ins during the first year. Details of Call2Recycle's on boarding process can be found in *Appendix D*.
- After their initial year in the program. Call2Recycle contacts sites, minimally twice a year, to review program specifics, shipping and compliance and how the program is working for them. This may be done via phone, email or in-person site visits.
- Non-compliant or non-program incidents are recorded at the time the receipt is processed. Incident reports (*Appendix O*) are reviewed daily by Call2Recycle's Safety and Compliance Manager. Incidents are recorded for each individual collection site and contacted by email and/or phone to advise them of the issue. In case of a repeat offender the site may be suspended from receiving supplies until the appropriate training and/or other corrective action has taken place.





- Bulk shipments can be scheduled on-line with the use of a program that assists in utilizing the correct language that is monitored by the DOT (*excerpt from instruction document- Appendix P*). This on-line tool has multiple checkpoints for the collection site to indicate that their battery shipment is in compliance. For example, the user would be asked to confirm that “none of these batteries are recalled, defective or damaged, as they would require special attention.”
- Regularly provide program participants with safety updates to maintain DOT compliance. Updates are communicated over a period of time and in multiple ways such as outreach calls, emails, newsletters, print materials and webinars.
- Given the amount of instruction and information shared, Call2Recycle employees are mandated to go through quarterly safety and compliance training to maintain a high degree of knowledge.





## VI. Education and Outreach

### A. Statutory Citation

10 V.S.A. § 7584. PRIMARY BATTERY STEWARDSHIP PLAN

- (a) *Primary battery stewardship plan required. On or before June 1, 2015, each producer selling, offering for sale, distributing, or offering for promotional purposes a primary battery in the State shall individually or as part of a primary battery stewardship organization submit a primary battery stewardship plan to the Secretary for review.*
- (6) *Education and outreach. A primary battery stewardship plan shall include an education and outreach program. The education and outreach program may include mass media advertising in radio or television broadcasts or newspaper publications of general circulation in the State, retail displays, articles in trade and other journals and publications, and other public educational efforts. The education and outreach program shall describe the outreach procedures that will be used to provide notice of the program to businesses, municipalities, certified solid waste management facilities, retailers, wholesalers, and haulers. At a minimum, the education and outreach program shall notify the public of the following:*
  - (A) *That there is a free collection program for all primary batteries; and*
  - (B) *The location of collection points and how to access the collection program.*

***In addition to the statutory citation, the information below is from the VT ANR Primary Battery Stewardship Guidance:***

*Outreach on the program shall include PSAs, news media, radio, television, municipal newsletters, retailer mailings, online list serves, website and social media.*

*Outreach plan shall describe target audiences and number of proposed ads, television or radio spots, mailings, etc. Describe frequency of ad campaigns and how outreach will be ongoing to ensure public is continually educated. It shall also include samples of outreach materials such as posters and brochures to be provided to retailers and collection facilities for display describing program and guidelines for collection in order to assist retailers with the requirement to make educational materials available to consumers. Retailers and collection facilities must not be charged a fee for any of these educational materials.*

*Collection points should be made available on an online mapping tool via website. Information regarding collection sites should be made available to municipalities so they can inform residents of what exists in their region. A strong effort shall be made to target specific regions that have low accessibility and convenience to battery recycling.*



## B. Strategic Approach

Call2Recycle® will employ an integrated, multi-channel approach through traditional, non-traditional, and digital media, as well as sponsorships and partnerships to efficiently reach the defined target audiences and further battery diversion goals. An aggressive education and program awareness-building campaign will primarily focus on Vermont residents, as well as other key audience segments, including collection network participants - businesses, municipalities, solid waste management facilities, retailers and haulers - to raise awareness, drive participation, and maximize collections. On a parallel track, Call2Recycle® will implement a proactive program to reach key opinion leaders, stakeholders and media outlets, aimed at cooperating to raise overall awareness of a voluntary, industry-led initiative to recycle household batteries.

While Call2Recycle operates a national program across North America, it also appreciates the unique characteristics of individual states, including Vermont, its residents and available communication channels. Knowing who to reach and how to reach them is critical to the success of any outreach and education plan. To that end, Call2Recycle is in current discussions with, and will retain, a Vermont-based marketing resource(s) to assist in the program launch.

To ensure a successful statewide education and awareness campaign, Call2Recycle will commit at least 20% in year one, and at least 10% in subsequent years, of its annual revenue from participating Vermont Producers on outreach and education efforts. Call2Recycle will evaluate its program annually against key metrics, including collection targets, collection network accessibility, and consumer behaviors, attitudes and actions, and will adjust its efforts accordingly.

### **Messaging**

The program strategy will utilize three concise messages:

- 1) *Educate*: inform that something is changing —that a free collection and recycling solution now exists for all consumer batteries, not just rechargeables – and what types of batteries can be recycled.
- 2) *Motivate*: inspire the audience to recognize the role they play — raising awareness of the importance of battery recycling
- 3) *Move to action*: demonstrating the accessibility of battery drop-off sites, and providing a range of opportunities to find collection locations via online and telephone locator.

### **Three-Phase Approach**

The education and outreach program described below is intended to establish, build and influence behaviors, attitudes and actions around battery recycling in Vermont. To do so, the education and outreach plan has been divided into the following phases: pre-launch, launch and ongoing.

- *Phase I – Pre-launch (Oct-Dec 2015)*: Inform and secure stakeholders and collection sites; generate early awareness
- *Phase II – Launch (Jan-Jun 2016)*: Broaden public awareness about battery recycling and informing that such a service now exists statewide
- *Phase III – Ongoing (July 2016 and beyond)*: Secure continued interest and participation in battery recycling program from all audiences assuring continuous improvement and performance.

From developing a robust, accessible collection network to motivating consumers to take action, Call2Recycle's education and outreach plan will be structured to reach the following key target audiences:



### Target Audiences

- A. Vermont Residents
- B. Collection Network
  - Public-facing (collects directly from residents): Municipalities, Retailers, Solid Waste Facilities
  - Private: Solid Waste Facilities, Businesses, Wholesalers, Haulers
- C. Stakeholders
  - Key Influencers [(Local Government, Industry and Trade Associations, Non-Governmental Organizations (NGO's))]
  - Battery Stewards
  - Media outlets

*Samples of Call2Recycle marketing materials are in Appendix Q.*



### C. Phase 1: Pre-launch (October-December 2015)

Due to the holiday season, Call2Recycle will limit its direct-to-consumer outreach to digital and media initiatives and instead will use the pre-launch phase to build and reinforce collection site participation.

### Pre-launch Objectives

- Inform all audiences (listed above) of ACT 139-10 V.S.A Chapter 168 and reinforce their roles and responsibilities within the program
- Develop an enthusiastic and motivated stakeholder base (stewards and collection network)
- Build early, widespread awareness and excitement that no-cost, primary battery recycling will soon be available

### Key Tactics & Deliverables

- Unveil a Vermont-specific landing page on [call2recycle.org](http://call2recycle.org) that encompasses promotional, educational and customizable materials:
  - Residents: How the program works, FAQs, and general recycling information
  - Collection Network: customized materials (posters, web banners, customized press releases and videos) to promote participation and educate residents
  - Media: a press kit including fact sheets, images, and B-roll video
  - Stewards: links to the law, FAQs on steward fees, list of participating Producers and their brands.
- Dedicated outreach campaign to stakeholders and potential collection sites, supplemented by various support materials, explaining the 5 W's (Who, What, When, Where, Why) and solicit their participation
  - Collection Network:
    - Develop and send dedicated mailer/email encouraging participation in the collection or promotion of battery recycling.
    - Follow-up mailer/email with phone calls to encourage participation and help explain program
- To ensure proper set up and implementation, Call2Recycle staff will meet in person with various collection sites. In addition to discussing the logistics of the program, Call2Recycle staff will review the various promotional tools available to collection sites to help raise program awareness.



- A printed and digital welcome & launch kit will be distributed providing general information on the Call2Recycle program in Vermont (also available on the Vermont-specific landing page) and will include materials such as: fact sheet, FAQs, collateral (signage and handouts), and promotional items such as newsletter text, web banners, social media content, etc...
- Call2Recycle's best-in-class customer service team will be available via a toll-free information line (1-877-723-1297) to engage collection sites, support inquiries and process orders for collection materials.
- Residents and Stakeholders: to tease the upcoming program prior to the 2016 launch, Call2Recycle will:
  - Highlight the upcoming program in the Call2Recycle monthly newsletter as a Q & A (November 2015 and December 2015 edition)
  - Highlight the program via Call2Recycle social media channels (Twitter and Facebook) by working into the monthly cadence (twice a month throughout November and December 2015)
  - Implement media relations outreach designed to educate local media about the new program; secure at least two news stories in November and December (broadcast and/or print)
- To benchmark current consumer awareness of battery recycling in Vermont, Call2Recycle will utilize a consumer focused survey. This survey will be conducted 2x/year – January and December – as an additional measurement to gauge effectiveness of education and outreach initiatives.

#### D. Phase II: Launch (January-June 2016)

During the launch phase, Call2Recycle will focus its attention on educating all Vermont residents that a statewide solution now exists for the recycling of all household batteries and motivating them to take action. Call2Recycle will commit at least 10% of its revenue from participating Vermont Producers - to ensure a successful statewide education and awareness campaign.

##### Key Tactics & Deliverables

- A press event will be held serving as the springboard for the launch of the statewide education and awareness campaign:
  - Create press release announcing the program to publish early January 2016
  - Call2Recycle will host a press event to kick-off the new program and will invite the media, local government, collection sites, and other interested groups and individuals. Government officials would be encouraged to give remarks about the launch of single-use battery recycling in Vermont (and the first U.S. state to embark on this endeavor); Call2Recycle can introduce select partners/stewards about their involvement in the program.
  - Promote via traditional and social media outlets (newspaper, Facebook, Twitter, local associations, etc.)
  - Statewide Awareness Campaign:
    - Develop a public service announcement (PSA) for use online, as well as distributed through a dedicated paid advertising campaign. Call2Recycle will also explore opportunities to become an Underwriter to Vermont Public Radio to help spread the message.
    - Place print and online ads in widely-read, community-based newspapers for a minimum of 2 weeks in both January and February 2016. Publications could include:
      - Vermont Daily Life (Circulation 68,000)
      - Burlington Free Press (Circulation 32,000)
      - The Vermont Journal (Circulation 29,000)
      - Rutland Herald (Circulation 12,500)
      - The Manchester Journal (Circulation 10,750)



- Barre Montpelier Times Argus (Circulation 7,500)
  - Media Relations: Call2Recycle will actively engage media outlets through the development of articles, press releases, and relevant content to secure interviews and program interest, including contributed articles for major local papers. The articles can be a combination of consumer-type stories about the importance of battery recycling, introducing single-use battery recycling, and how to find a collection site. Additionally, Call2Recycle would place news articles about the program and the first introduction of single-use recycling to a U.S. state.
  - Call2Recycle's monthly newsletter will feature updates and highlight program participants
  - In conjunction with the above, Call2Recycle will promote its general program offerings to ensure residents know where to find a location for recycling:
    - Promote its zip code-driven locator (found on [call2recycle.org](http://call2recycle.org)) using Vermont-specific display ads to inform consumers of nearby collection drop-off locations. (*Appendix C*)
- During this phase, Call2Recycle's customer service team would continue to serve the Vermont collection network through inbound and outbound call and email campaigns.



## E. Phase III: Ongoing (July 2016 and Beyond)

To ensure battery recycling remains top-of-mind for consumers and stakeholders, Call2Recycle will develop and implement an annual outreach and education plan. Call2Recycle commits to spending an incremental 10% of total annual primary battery steward fees to promote the program during the post-launch phase. The program will align its outreach efforts around key seasonal campaigns that can be replicated each year, which may include National Battery Day (Feb 18), Earth Day, Daylight Savings Time, and Post-Holiday. While a detailed plan will exist, Call2Recycle will allow for modifications to its initiatives based on key learnings and measures of success.

### Ongoing Objectives

- Increase consumer awareness levels
- Retain and grow participants in collection network
- Maintain the appeal of the program as the 'newness' wears off
- Generate media relations opportunities across the state

### Key Tactics & Deliverables

- Produce, promote and manage seasonal campaigns to drive consumer awareness and increase battery recycling that can be replicated each year, may include National Battery Day (Feb 18), Earth Day, Daylight Savings Time, and Post-Holiday.
- To retain existing collection sites, a minimum of two times per year, Call2Recycle will contact these sites to review the program specifics and how it is working. This may be done via phone, email, or in-person visits.
- In support of its USA and Canadian goal of having 95% of consumers within 10 miles of a collection site, Call2Recycle will continue to secure additional collection sites in Vermont.





- Conduct an annual consumer awareness omnibus survey to compare to benchmark results (see Phase 1) to gauge effectiveness of education and outreach initiatives in Vermont.
- Execute a multi-prong public relations plan that will supplement its ongoing consumer education efforts. This may include bylined press releases, media outreach, articles, case studies, blogs, social media (local/city pages on Facebook), etc...
- Continually enhance the Vermont-specific landing page on call2recycle.org to include relevant content and updated, customized program materials. This would also include display ads for significant Vermont towns regularly listed on the drop-off site locator map
- Where appropriate, provide materials or have a presence at tradeshow to encourage program participation

## VII. Producer to Producer Reimbursement

### A. Statutory Citation

#### 10 V.S.A. § 7584. PRIMARY BATTERY STEWARDSHIP PLAN

(a) *Primary battery stewardship plan required. On or before June 1, 2015, each producer selling, offering for sale, distributing, or offering for promotional purposes a primary battery in the State shall individually or as part of a primary battery stewardship organization submit a primary battery stewardship plan to the Secretary for review.*

(7) *Reimbursement. A primary battery stewardship plan shall include a reimbursement procedure that is consistent with the requirements of subchapter 4 of this chapter.*

#### § 7589. REIMBURSEMENT; AUTHORIZATION

(1) *A producer or a primary battery stewardship organization operating under an approved primary battery stewardship plan that collects primary batteries or rechargeable batteries that are not listed under its approved plan shall be entitled to reimbursement from the following entities of reimbursable costs per unit of weight incurred in collecting the batteries:*

(2) *Reimbursement may be requested by a collecting primary battery producer or primary battery stewardship organization only after that producer has achieved the collection rate performance goal approved by the Secretary under section 7584 of this title.*

(A) *Reimbursable costs. Under this subchapter, reimbursement shall be allowed only for those costs incurred in collecting the batteries subject to the reimbursement request. Reimbursable costs include:*

- (1) *costs of collection, transport, recycling, and other methods of disposition identified in a primary battery stewardship plan approved pursuant to section 7586 of this title; and*
- (2) *Reasonable educational, promotional, or administrative costs.*

#### § 7590. REIMBURSEMENT PROCESS

(1) *A primary battery producer, primary battery stewardship organization, or rechargeable battery stewardship organization that incurs reimbursable costs under section 7589 of this title shall submit a*



*request to the producer of the collected primary battery or the primary battery stewardship organization in which the producer is participating or the rechargeable battery stewardship organization responsible for the collected rechargeable battery.*

- (2) A producer or primary battery stewardship organization or rechargeable battery stewardship organization that receives a request for reimbursement may, prior to payment and within 30 days of receipt of the request for reimbursement, request an independent audit of submitted reimbursement costs.*
- (3) The independent auditor shall be responsible for verifying the reasonableness of the reimbursement request, including the costs sought for reimbursement, the amount of reimbursement, and the reimbursable costs assessed by each of the two programs.*
- (4) If the independent audit confirms the reasonableness of the reimbursement request, the producer, primary battery stewardship organization, or rechargeable battery stewardship organization requesting the audit shall pay the cost of the audit and the amount of the reimbursement calculated by the independent auditor. If the independent audit indicates the reimbursement request was not reasonable, the producer or primary battery stewardship organization that initiated the reimbursement request shall pay the cost of the audit and the amount of the reimbursement calculated by the independent auditor.*
  - (b) Role of Agency. The Agency shall not be required to provide assistance or otherwise participate in a reimbursement request, audit, or other action under this section, unless subject to subpoena before a court of jurisdiction.*

## B. Producer Participation and Reimbursement

As part of its routine process, Call2Recycle will sample batteries generated by Vermont collection locations to determine: 1) if there are “orphaned” batteries or batteries from “free-riders” not participating in an approved plan; and 2) battery brands that may be participating in another approved plan that simply ended up in the Call2Recycle waste stream. Call2Recycle will closely track and monitor these incidences.

To start, in August 2014, members and staff of the Dry Battery Section of the National Electrical Manufacturers Association (NEMA), Corporation for Battery Recycling (CBR), Vermont Agency of Natural Resources and the Chittenden County (Vermont) Solid Waste District (CSWD) conducted a battery sort of primary batteries. The purpose of the sort was to identify and record the variety of company brands for the most common household batteries present in the Vermont waste stream. At the time of plan submission, of the 150+ brands identified, Call2Recycle is in active discussions with 20 of them, 3 have declined to be represented by Call2Recycle, 18 are exempt from the law (either sold with products or not sold in Vermont) and the manufacturer is either overseas or cannot be identified for 38 brands. Please see *Appendix R* for details.

Additionally, Call2Recycle will routinely monitor battery sales in the State to validate that obligated battery producers are participating in an approved plan.

Audit selection is random; a minimum of one bulk shipment and approximately 100 boxes shipped from Vermont collectors will be pulled and staged over a specified period of time (based on daily volume). Once the selection is staged, the audit process begins and the information below is captured for every battery unit contained in the sample:



- Chemistry
- Brand
- Manufacturer and manufacturer location

It will provide, on an annual basis, a report to the state of Vermont of the ongoing monitoring activities, seeking enforcement assistance and, if collection performance goals are met, advising on potential reimbursement actions as appropriate. Call2Recycle Inc., understands that according to 10 V.S.A. Chapter 168 §7590 (b) the Agency shall not be required to provide assistance or otherwise participate in a reimbursement request, audit, or other action under this section, unless subject to subpoena before a court of jurisdiction.

## VIII. Collection Rate Performance Goals

### A. Statutory Citation

*10 V.S.A. § 7584. PRIMARY BATTERY STEWARDSHIP PLAN*

*(a) Primary battery stewardship plan required. On or before June 1, 2015, each producer selling, offering for sale, distributing, or offering for promotional purposes a primary battery in the State shall individually or as part of a primary battery stewardship organization submit a primary battery stewardship plan to the Secretary for review.*

*(8) Performance goal; collection rate. A primary battery stewardship plan shall include a collection rate performance goal for the primary batteries subject to the plan. The collection rate includes the estimated total weight of primary batteries that will be sold or offered for sale in the State by the producer or the producers participating in the primary battery stewardship plan.*

*The plan defines "Collection rate" as a percentage by weight that each producer or primary battery stewardship organization collects by an established date. The collection rate shall be calculated by dividing the total weight of the primary batteries that are collected during a calendar year by the average annual weight of primary batteries that were estimated to have been sold in the State by participating producers during the previous three calendar years. Estimates of primary batteries sold in the State may be based on a reasonable pro rata calculation based on national sales.*

### B. Collection Rates

The collection goal of the plan is to attain a 20% collection rate by the end of year five (2020) of the plan. Several data points were used to establish the proposed collection rate but three are the most relevant. Call2Recycle will annually assess performance against targets using pre-defined metrics and may adjust strategies and spend accordingly, if necessary. Any performance deficiencies will be outlined in a remediation plan, including corrective and strategic actions.

First, Call2Recycle attempted to develop targets based on an early 2015 state survey of municipal waste collection of primary batteries. That survey did not provide robust data to inform on what the first year collection rate should be. Therefore, the rate proposed above is a conservative estimate of what is already being collected and what can be added to it during the first year of operation.





Second, the year five collection rate reflects Call2Recycle Canada's experiences in British Columbia where, in July 2010, Call2Recycle Canada's voluntary rechargeable program evolved into a mandatory all-battery program. The effort in British Columbia is currently attaining approximately an all-battery collection rate of 23% during its fifth year of operation. Since batteries are but one of over a dozen products and materials that are subject to an extended producer responsibility (EPR) requirement in the Province, which has created a recycling infrastructure and a broad-based cultural expectation of recycling, it seems prudent to hold year five collection expectations to something somewhat less than the current British Columbia performance.

Finally, in the European Union's (EU) Battery Directive (2006/66/EC) (*Appendix R*), which was issued on September 6, 2006, for all batteries, requires member states to transpose the Directive and attain a 25% collection rate by September 30, 2012, 6 years after the Directive was issued. Out of 31 countries, there were 3 that did not meet the all battery goal in 2012. The Call2Recycle collection rate targets including herein with this plan reflects the expectation that it takes the full 6 years to attain a 25% primary battery collection rate.

Per the law, the collection rate will be determined by the below calculation:

$$\frac{\text{Total weight of the primary batteries collected during each calendar year}}{\text{Average annual weight of primary batteries estimated to have been sold in the State by producers participating in this plan during the previous three calendar years}}$$

**Note:** The three year rolling average of actual sales or pro rata national sales of companies participating in this stewardship organization plan will be due to Call2Recycle by January 31<sup>st</sup> of each year. Call2Recycle continues to add Producers to this plan and is in the process of collecting the first set of three year sales data, 2012-2014 to establish the denominator for 2016's collection rate. Once this information has been finalized, no later than November 30, 2015, Call2Recycle will notify the State of the total average for the three years.

Below (*Figure 4*) are Call2Recycle's five year goals for the State of Vermont's primary battery collections:



Figure 4: Five Year Collection Rate Forecast



## IX. Annual Report and Plan Audit

### A. Statutory Citation

#### § 7585. ANNUAL REPORT; PLAN AUDIT

- (a) *Annual report. On or before March 1, 2017, and annually thereafter, a producer or a primary battery stewardship organization shall submit a report to the Secretary that contains the following:*
- (1) *the weight of primary batteries collected by the producer or the primary battery stewardship organization in the prior calendar year;*
  - (2) *the estimated percentage, by weight, of rechargeable batteries collected by the producer or the primary battery stewardship organization in the prior calendar year;*
  - (3) *the percentage of primary batteries collected in the prior calendar year that are from producers who are not participating in any approved stewardship plan, based on periodic sorting of primary batteries by the reporting producer;*
  - (4) *the collection rate achieved in the prior calendar year under the primary battery stewardship plan, including a report of the estimate total sales data by weight for primary batteries sold in the State for the previous three calendar years;*
  - (5) *the locations for all collection points set up by the primary battery producers covered by the primary battery stewardship plan and contact information for each location;*
  - (6) *examples and description of educational materials used to increase collection;*
  - (7) *the manner in which the collected primary batteries were managed*
  - (8) *any material change to the primary battery stewardship plan approved by the Secretary pursuant to section 7586 of this title; and*
  - (9) *the cost of implementation of the primary battery stewardship plan, including the costs of collection, recycling, education, and outreach.*
- (b) *Plan audit. After five years of implementation of an approved primary battery stewardship plan, a primary battery producer or primary battery stewardship organization shall hire an independent third party to conduct a one-time audit of the primary battery stewardship plan and plan operation. The auditor shall examine the effectiveness of the primary battery stewardship plan in collecting and recycling primary batteries. The independent auditor shall examine the cost-effectiveness of the plan and compare it to that of collection plans or programs for primary batteries in other jurisdictions. The independent auditor shall submit the results of the audit to the Secretary as part of the annual report required under subsection (a) of this section.*

### B. Annual Report

Beginning on March 1, 2017, and annually thereafter, Call2Recycle will provide an annual report to the Secretary of the Agency of Natural Resources. The annual report will also be available on the program website. The report will include, but not be limited to, the following:

1. The total weight of primary batteries collected in the State
2. An estimate of the total amount of primary batteries by weight sold into the state by producers working with Call2Recycle



3. The percentage of primary batteries collected in the prior calendar year that are from producers who are not participating in any approved stewardship plan, based on periodic sorting of primary batteries by the reporting producer
4. The collection rate achieved in the prior calendar year under the primary battery stewardship plan, including a report of the estimate total sales data by weight for primary batteries sold in the State for the previous three calendar years
5. A description of how the recovered batteries were managed
6. The location and contact information for all collection sites
7. Examples and description of educational materials used to increase collection
8. Any change to the primary battery stewardship plan
9. The cost of implementation of the primary battery stewardship plan, including the costs of collection, recycling, education, and outreach.

### C. Plan Audit

In 2021, five years after plan implementation, Call2Recycle will hire an independent third party to conduct a one-time audit of the primary battery stewardship program operation. The auditor will examine the effectiveness of Call2Recycle's program in collecting and recycling primary batteries. The independent auditor will examine the cost-effectiveness of the plan and compare it to that of collection plans or programs for primary batteries in other jurisdictions. The independent auditor will submit the results of the audit to the Secretary as part of the annual report required under subsection (a) of Section 7585.



## X. Appendices

### A. Board of Directors



Back Row (Left to Right)	Front Row (Left to Right)
Andrew Sirjord (Chairman), <a href="#">Sanyo Energy (U.S.A.) Corporation</a>	Chip Wildes, <a href="#">Saft America, Inc.</a>
Roger Dower, <a href="#">The Johnson Foundation</a>	John Bradford, <a href="#">Interface Americas</a>
John Matthews, Matthews Strategic Services, LLC	Doug Smith, <a href="#">Sony Electronics, Inc</a>
James Bremner, <a href="#">Varta Microbattery, Inc.</a>	Linda Biagioni, (Retired) from <a href="#">Stanley Black &amp; Decker</a>
	Charlie Monahan, <a href="#">Panasonic Energy Corporation</a>

Not Shown: Daniel Hutter: Spectrum Brands (Rayovac), Mark Boolish: Energizer Battery Manufacturing Inc., and Steven Wicelinski: Duracell



## Call2Recycle Officers



Carl Smith  
President and CEO



Linda Gabor  
Vice President, Marketing &  
Customer Service



Greg Broe  
Vice President, Finance &  
Administration



Leo Raudys  
Vice President of Program  
Development



Joe Zenobio  
Executive Director Canada





## B. Participating Producers

Name	Brands	Address	Contact Information
Ace Hardware Corporation	ACE	2200 Kensington Court Oak Brook, IL 60523	Heather Buck 630-990-3154 hbuck@acehardware.com
Delhaize America (Hannaford Supermarkets)	Home 360	2110 Executive Dr. Salisbury, NC 28147	George Parmenter 704-633-8250 george.parmenter@delhaize.com
Do It Best	Do It Best	6502 Nelson Rd Fort Wayne, IN 46803	Steve Markley 260-748-5500 Steve.markley@doitbest.com
Dollar General	DG Home	100 Mission Ridge Goodlettsville, TN 37072	Nina Burse 615-855-4683 nburse@dollargeneral.com
Dorcy International, Inc	Dorcy, Dorcy Industrial, Mastercell, Diehard	2700 Port Rd Columbus, OH 43217	Kathy Venhoeven 614-333-1016 kathy@dorcy.com
Duracell/The Gillette Company/Proctor & Gamble	Duracell, Duracell Ultra, Duracell Coppertop, Duracell Procell, Duracell Activair, Duracell Coppertop Ultra Power, Duracell Mallory, Duracell Power Pix, Duracell Prismatic, Duracell Quantum, Duracell Ultra Advanced	One Gillette Park South Boston, MA 02127	Steven Wicelinski 203-731-6406 wicelinski.sp@pg.com
Energizer Battery Manufacturing, Inc	Energizer, Energizer Max, Energizer Ultimate, Energizer eco advanced, Energizer advanced, Energizer Industrial, Eveready, Eveready Gold, Eveready Super Heavy Duty	25225 Detroit Rd Westlake, OH 44145	Marc Boolish 440-835-7659 marck.boolish@energizer.com
Family Dollar Stores of Vermont, Inc.	Family Dollar	P.O. Box 1017, Charlotte, NC 28201	Al Vasquez 704-814-5836 avasquez@familydollar.com
General Wireless Operation, Inc. (Formerly RadioShack)	RadioShack, RadioShack Extended Life	300 RadioShack Cir Fort Worth, TX 76102	Dwayne Campbell 817-415-3203 dwayne.campbell@radioshack.com
GP Batteries International Limited	GP, Gold Peak, GP Super, GP Ultra Plus, GP Ultra, GP Supercell, GP High Voltage, GP Greencell	8370 NW 66th St Miami, FL 33166	Harold Decker 858-674-6099 <a href="mailto:harold_decker@goldpeak.com">harold_decker@goldpeak.com</a>



Name	Brands	Address	Contact Information
Interstate Batteries Recycling, LLC	Interstate, Workaholic, PowerVolt, Power Patrol	12770 Merit Drive Dallas, TX 75251	Dan Lane 972-715-6672 dan.lane@ibsa.com
Maxell Corporation of America	Maxell, Maxell Gold, Maxell Super Power Ace	3 Garret Mountain Plz Woodland Park, NJ 07424	Bob Meadows 843-682-2040 rmeadows@maxell.com
Original Power Inc.	Sharper Image	133 Lawrenceville-Suwanee Rd Ste. 12-311 Suwanee, GA 30024	Matt Breneman 770-418-1850 matt@originalpower.com
Panasonic Corporation	Panasonic, Panasonic Pro, Panasonic Evolta	2 Riverfront Plazz Ste 200 Newark, NJ 07102	Charles Monahan 201-392-6464 charles.monahan@us.panasonic.com
PLR IP Holdings, LLC (Polaroid)	Polaroid	4350 Baker Rd Minnetonka, MN 55343	Jack Goetzke 952-641-1029 jack.goetzke@polaroid.com
PowerMax Battery USA	Essential Everyday (Shaw's Supermaket), Smart Living (A&P), Tops (Fresh Direct), American Choice, Powermax, AC Delco	11750 Jersey Blvd Rancho Cucamo, CA 91730	Neville Lin 909-945-2111 neville@posermamaxusa.com
Rayovac/Spectrum Brands	Rayovac, Fusion, Rayovac Hybrid, Rayovac I-C3, Rayovac Platinum, Rayovac Renewal, Rayovac Ultra Cordless, Rayovac Ultra Pro	3001 Deming Way Middleton, WI 53562	Dan Hutter 608-278-6625 daniel.hutter@spectrumbrands.com
RiteAid	Rite Aid, Rite Aid Home	30 Hunter Lane Camp Hill, PA 17011	Matthew Boyer 717-975-9703 mboyer@riteaid.com
Sony Electronics, Inc.	Sony, Sony Acti Force, Sony Cyber-Shot, Sony Cycle Energy, Sony Stamina, Sony Stamina Platinum	16450 Technology Center San Diego, CA 92127	Douglas Smith 858-942-2729 Douglas.Smith@am.sony.com
Surefire, LLC	Surefire	18300 Mt. Baldy Circle, Fountain Valley, CA 92708	Sean Vo 714-545-944 seanvo@cox.net
Varta Microbattery Inc	Power One, Ecopack, Auditas, Eco Gold, Siemens, Connect Hearing, Audigy, VARTA	555 Theodore Fremd Ave Rye, NY 10580	James Bremner 914-570-2222 james.bremner@varta-microbattery.com



## C. Locator

Program Info | Participation | Provinces | Resources | News Room | Become a Collection Site | Become a Steward

YOU ARE HERE: HOME / BATTERY & CELLPHONE RECYCLING LOCATIONS [Print](#) [Email](#) [Link to this page](#)

### FIND RECYCLING LOCATIONS

LOCATIONS WITHIN

OF

[SEARCH](#)

Participating Vendor

### RECYCLE ON THE WAY

Heading to the grocery or on your way to the office? Why make an extra trip when you can Recycle on the Way.

Provide your start and end addresses and we'll show you a drop-off location en route to your destination.

FROM:

TO:

[PLAN YOUR TRIP](#)

© OpenStreetMap contributors

### 12 Locations Near You

Viewing 1-6 of 12 results Page 1 of 2

LOCATION	DISTANCE	ACCEPTED MATERIALS*	CONNECT
1 Home Depot 759 Harvest Ln WILLISTON, VT 05495 802-872-0039	2.71 miles	<ul style="list-style-type: none"> <li>Rechargeable Batteries</li> <li>Cellphones</li> <li>Alkaline</li> <li>Single-use batteries</li> <li><a href="#">Learn More</a></li> </ul>	<a href="#">Send to email</a> <a href="#">Send to mobile</a> <a href="#">View Local Page</a>
2 Chittenden Solid Waste District 1011 Airport Pkwy SOUTH BURLINGTON, VT 05403 802-865-4663	8.57 miles	<ul style="list-style-type: none"> <li>Rechargeable Batteries</li> <li>Cellphones</li> <li>Alkaline</li> <li>Single-use batteries</li> <li><a href="#">Learn More</a></li> </ul>	<a href="#">Send to email</a> <a href="#">Send to mobile</a> <a href="#">View Local Page</a>
3 Verizon Wireless 825 Williston Rd SOUTH BURLINGTON, VT 05403 802-865-3100	9.14 miles	<ul style="list-style-type: none"> <li>Rechargeable Batteries</li> <li>Cellphones</li> <li>Alkaline</li> <li>Single-use batteries</li> <li><a href="#">Learn More</a></li> </ul>	<a href="#">Send to email</a> <a href="#">Send to mobile</a> <a href="#">View Local Page</a>
4 Lowes 10 Susie Wilson Rd ESSEX JUNCTION, VT 05452 802-662-9131	9.17 miles	<ul style="list-style-type: none"> <li>Rechargeable Batteries</li> <li>Cellphones</li> <li>Alkaline</li> <li>Single-use batteries</li> <li><a href="#">Learn More</a></li> </ul>	<a href="#">Send to email</a> <a href="#">Send to mobile</a> <a href="#">View Local Page</a>

### HOW CALL2RECYCLE® WORKS

Since 1996, Call2Recycle has safely diverted over more than 45 million kilograms of batteries and cellphones. Learn about how the Call2Recycle program works.

### CUSTOMER SERVICE

Our team is happy to answer any question you may have about our program and recycling rechargeable batteries. Contact Customer Service or call 1.888.224.9764







## D. New Enrollment On boarding

Recharging the planet. Recycling your batteries.™



### 2015 Outreach for New Enrollments

Call2Recycle® is committed to providing exemplary customer service and dedicated to the successful participation of new locations enrolled in our battery and cellphone recycling program. As part of that commitment, our Customer Service Team has scheduled outreach activities throughout the first year to check-in on each location and their participation, as outlined below:

Outreach Activity	Description
Welcome Kit with detailed program information	Provided to Point-of-Contact (POC) for the location via that person's email address. For those locations where we do not have an email address associated, the Customer Service Team member will relay the same information during the enrollment phone call.
30 Day Check-In	Locations that provided an email address will receive an email that reminds the POC of key features of the program. Those participants where we do not have an email address will receive a phone call.
90 Day Check-In	Any participants that have <i>not</i> sent in batteries during their first 90 days will receive a phone call from our Customer Service Team to check on status and ensure there are no questions or issues.
6 Month Check-In	Participants will receive a phone call from our Account Management or our Customer Service Team to check-in on how the program is working and make sure there are no questions or issues. Any locations that have <i>not</i> sent in batteries and are set up to receive batteries from the public are removed from our drop-off website locator.
9 Month Check-In	Any participants that have not sent in batteries during the previous 9 months will receive notification, either by phone or email, that if batteries are not received before the location's one year anniversary, the account will be closed in our system.
12 Month Check-In	Participants receive either a phone call or an email that shares the total collections the location has generated in its first year OR if no batteries have been received, the location is informed that the account has been closed in our system.

We appreciate your partnership and support. Questions or comments, please contact our Customer Service Team at 877-723-1297 or [customerservice@call2recycle.org](mailto:customerservice@call2recycle.org).



## E. Collection materials and collaterals – new enrollment email

Hello new Vermont collection site,

Welcome to Call2Recycle®, a program dedicated to promoting environmental sustainability by providing free battery and cellphone recycling in the USA and Canada. We applaud you for taking a proactive role in the preservation of our environment. Together, we are keeping Vermont green by recycling your batteries. Your assigned Call2Recycle Site ID # is XXXX. Your collection kit will ship tomorrow via (UPS or FedEx) ground service Attention [Insert Name] - please allow 3-4 business days for arrival.

Replacement collection kits will automatically be sent to you allowing you to save time! Once your shipment has been received at our recycling facility, Call2Recycle's automated program will determine when your location's on-hand box quantity (boxes not yet scanned at the recycling facility) is equal to XX or less, and you will automatically be shipped another XX boxes.

We have provided the attached information to make it even easier to participate in our program.

The below is in an attachment to the new enrollment email.

### Welcome to Call2Recycle®

Thank you for enrolling in the Call2Recycle battery collection program. As a new program participant, you have access to a wealth of materials that will help you get started in your battery and cellphone recycling efforts. This document serves as your guide to answering your most pertinent questions and helping you launch the program successfully.

We are excited to work with you, and we are here to help. If you have questions, please contact our customer service department via phone: 1.877.723.1297, email: [customerservice@call2recycle.org](mailto:customerservice@call2recycle.org) or web: [call2recycle.org](http://call2recycle.org).

### Frequently Asked Questions

1. **Who is Call2Recycle?** Call2Recycle is a not for profit organization that promotes environmental sustainability by providing free battery and cellphone recycling in the USA and Canada.
2. **How much does the program cost?** The Call2Recycle program is offered at no cost, including shipping and collection materials.
3. **Who funds the program?** Call2Recycle is funded by product manufacturers across the globe committed to environmentally-sound recycling of batteries and cellphones. The primary battery collection in Vermont is funded specifically by battery producers selling their product into the State.
4. **What do you do with the batteries?** Collection sites ship batteries and cellphones directly to contracted [recycling facilities](#). Precious metals [recovered](#) from used batteries create new batteries and stainless steel products – none of the broken down material makes its way into landfills.



## The Collection Kit

In your initial collection kit, sent to your shipping address after you signed up, you will receive all that you need to begin collecting batteries and cellphones, including the following items:

Collection box with self-adhesive plastic bags for safe battery recycling. The box comes in small and large sizes.



Program guidelines with instructions for box assembly, shipping and battery handling.








An 8.5x11 poster that you can use to help inform others that you recycle batteries and cellphones.





### What Can I Collect?

The Call2Recycle program collects all consumer batteries (up to 11 lbs. each) and cellphones in Vermont. Below is a brief overview of the types of batteries that power various electronic products.

Battery Type	Commonly Found In...
 <p><b>Alkaline</b></p>	<ul style="list-style-type: none"> <li>• Alarm Clocks</li> <li>• Calculators</li> <li>• Flashlights</li> <li>• TV remote controls</li> <li>• Remote control toys</li> </ul>
Battery Type	Commonly Found In...
 <p><b>Lithium Primary</b></p>	<ul style="list-style-type: none"> <li>• Car keyless entry remotes</li> <li>• Watches</li> <li>• Pacemakers</li> </ul>
 <p><b>Nickel Cadmium</b></p>	<ul style="list-style-type: none"> <li>• Cordless Power Tools</li> <li>• Cordless Phones</li> <li>• Digital Cameras and Video Cameras</li> <li>• Two-Way Radios</li> </ul>
 <p><b>Nickel Metal Hydride</b></p>	<ul style="list-style-type: none"> <li>• Cellphones</li> <li>• Cordless Power Tools</li> <li>• Cordless Phones</li> <li>• Digital Cameras</li> <li>• Two-Way Radios</li> </ul>
 <p><b>Lithium Ion</b></p>	<ul style="list-style-type: none"> <li>• Cordless Power Tools</li> <li>• Digital Cameras</li> <li>• Laptop Computers</li> <li>• Cellphones</li> </ul>
 <p><b>Small Sealed Lead Acid (SSLA)</b></p>	<ul style="list-style-type: none"> <li>• Mobility Scooters</li> <li>• Fire Emergency Devices</li> <li>• Emergency Exit Signs</li> <li>• UPS Back-Up Batteries</li> </ul>



## Tracking Progress

All program participants have access to their collection data through detailed summary reports. These reports include information such as pounds of batteries collected by chemistry, total collections over time, number of cellphones as well as collection trends. These reports can be shared with anyone in your organization.

Call2Recycle also provides Certificates of Recycling, insurance certificates and other compliance documentation upon demand. Just contact customer service at 1.877.723.1297 or [customerservice@call2recycle.org](mailto:customerservice@call2recycle.org).

## Quick Links

Our website is full of learning resources, program information, case studies and articles that can help you develop a successful battery recycling program over the long-term. Below are some quick links to direct you to the most important, frequently referenced sections as you get started.

[Safety & Shipping Tips](#) – how to safely package and prepare batteries for shipping

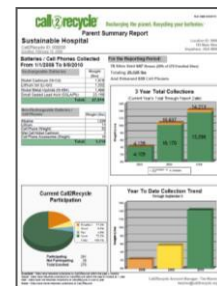
[Collection Kit Supply Order Form](#) – fill out this form to get more supplies of boxes and bags

[General Inquiries](#) – use this form to ask customer service representatives any questions about the program

[Monthly Newsletter](#) – sign up for our email newsletter or read past issues – they contain plenty of information about the latest happenings in battery and cellphone recycling

[Support Materials](#) – this page contains graphics and documents to help highlight your sustainability efforts with marketing materials such as logos, posters, photos and more

[Certifications and Audits](#) – for a list of current certifications and recognitions





## Collection materials and collaterals, continued – collection box insert



Recharging the planet. Recycling your batteries.™

### LARGE BOX: BATTERY AND CELLPHONE PROGRAM GUIDELINES

Follow these 6 simple steps, and you'll be on your way to responsibly recycle batteries and cellphones.

#### STEP 1: WHAT CAN BE ACCEPTED FOR RECYCLING?

- Consumer batteries each weighing less than 11 lbs
  - Nickel Cadmium (Ni-Cd)
  - Nickel Metal Hydride (Ni-MH)
  - Lithium Ion (Li-Ion)
  - Nickel Zinc (Ni-Zn)
  - Small Sealed Lead Acid (SSLA/Pb)
  - Alkaline/Carbon Zinc (AA, AAA, 9V, etc...)
  - Lithium Primary
- Cellphones (and their batteries) regardless of size, make, model or age, but not their accessories.

Batteries NOT Accepted: wet-cell or over 11 lbs

#### STEP 2: BUILD THE BOX



Remove shrink wrap. Pull and lift front flap.

#### STEP 2: (CONT'D)



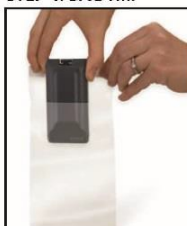
Insert header tabs into top slots and side flaps into back slots. Ensure bags are neatly positioned.

#### STEP 3: DATE & DISPLAY



Write today's date in the accumulation start date on the back of the box. Display the Call2Recycle collection box in a monitored, but viewable location.

#### STEP 4: BAG IT...



Insert one battery or cellphone in provided bags. For big batteries, or if no bag is available, cover terminals with tape (electrical/duct/packaging/masking).

#### SEAL IT...



Remove plastic strip from top of bag and seal.

#### DROP IT!



Deposit sealed bag into the box.

#### STEP 5: SECURE BOX



When the box is full (do not overfill; 66 lbs limit): Release header tabs, remove backing from inside tape strips and fold over front of box. Insert flaps into front slits.

#### STEP 6: PREPARE SHIPMENT



Secure box by cross-taping both vertically and horizontally. Print your return address on the pre-paid, pre-addressed shipping label. Add box to daily FedEx or UPS\*\* pick-up.

#### ADDITIONAL INFORMATION

\*\*UPS may charge a fee for scheduling pick-ups, so to avoid these charges, we recommend that you hold containers until a UPS delivery is made to your location.

Contact Us:  
Online at [call2recycle.org](http://call2recycle.org)  
Email: [customerservice@call2recycle.org](mailto:customerservice@call2recycle.org)  
Phone: 877.723.1297



© 2014 Call2Recycle® All Rights Reserved.





## Collection materials and collaterals, continued- collection box insert



Recharging the planet. Recycling your batteries.™

### Dear Call2Recycle Program Participant:

Welcome to Call2Recycle®, promoting environmental sustainability by providing no-cost battery and cellphone recycling in North America. Call2Recycle applauds you for taking a proactive role in the preservation of our environment. Together, we can Recharge the Planet.

The Call2Recycle program is easy to implement - just follow these simple steps:

1. **READ** the enclosed information and the safety guidelines that are printed on your collection box.
2. **TRAIN** the appropriate staff or personnel who will be interacting with the collection box or program. Be sure to emphasize the importance of the one battery (or cellphone with battery) per bag rule. If bags are unavailable, you can tape the exposed battery terminals with non-conductive electrical tape before placing them in the collection box. For additional training tools, please visit [call2recycle.org](http://call2recycle.org).
3. **DISPLAY** the Call2Recycle collection box in a monitored, but viewable, location. Keep box in a cool and dry location.
4. **BEGIN COLLECTING** all consumer batteries weighing less than 11 lbs each, and cellphones (with or without their batteries), and place in the box for recycling. The Call2Recycle program *does not* accept wet-cell batteries.
5. **REPLACEMENT BOXES** will automatically be sent to you allowing you to save time! Once your shipment has been received at the recycling facility, Call2Recycle's automated program will determine when more boxes should be sent to your location (allow up to three weeks for your replenishment boxes to arrive). Before ordering additional boxes, please check your location for boxes that have not been shipped, are not filled or remain unused. Exhausting supplies prior to ordering more supplies helps reduce costs and maintain efficient processes.

### Safety & Compliance

The Call2Recycle program operates in compliance with the U.S. Department of Transportation safety processes to ensure the safe collection, transport and recycling of batteries. Under this commitment, all participants must adhere to the ONE rechargeable battery, or ONE cellphone with battery, per bag rule. Each collection box must be packed as required by US DOT Special Permit DOT-SP 14849, and to that end has already been marked with "Used Batteries for Recycling: May Contain Lithium (ion) and Nonspillable Batteries. FOR HIGHWAY OR VESSEL TRANSPORT ONLY - FORBIDDEN FOR TRANSPORTATION BY AIRCRAFT." In case of emergency, you may call Call2Recycle's 24 hour INFOTRAC® response line at 1-800-535-5053.

**Questions?** If you have any program questions, please contact Call2Recycle's Customer Service Department by calling toll free 877-723-1297 or emailing [customerservice@call2recycle.org](mailto:customerservice@call2recycle.org).

Thank you for your support and for making a commitment to the environment.

Carl Smith  
President/CEO  
Call2Recycle®



Collection materials and collaterals, continued- collection box insert



# Recycle Your Batteries **HERE**



Make a difference in your community by recycling used batteries today.

**ITEMS ACCEPTED FOR RECYCLING:**  
batteries weighing less than 11lbs. No wet-cell, damaged or defective batteries accepted.

- Nickel Cadmium
- Lithium Ion
- Small Sealed Lead Acid
- Nickel Metal Hydride
- Nickel Zinc
- Alkaline/single-use
- Lithium Primary
- Cellphones of any make, model or age



**For more information**  
visit [call2recycle.org](http://call2recycle.org) or call 877.2.RECYCLE



## F. DOT special permit (revised June 30, 2015)

**June 30, 2015**



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety Administration**

East Building, PHH - 30  
1200 New Jersey Avenue, Southeast  
Washington, D.C. 20590

DOT-SP 14849  
(FOURTH REVISION)

**EXPIRATION DATE: December 31, 2015**

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: Call2Recycle, Inc.  
Atlanta, GA
2. PURPOSE AND LIMITATIONS:
  - a. This special permit authorizes the manufacture, marking, sale and use of non-DOT specification fiberboard boxes for the transportation in commerce of certain batteries without shipping papers, marking of the proper shipping name and identification number or labeling, when transported for recycling or disposal. This special permit provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein. The most recent revision supersedes all previous revisions.
  - b. The safety analyses performed in development of this special permit only considered the hazards and risks associated with transportation in commerce. The safety analyses did not consider the hazards and risks associated with consumer use, use as a component of a transport vehicle or other device, or other uses not associated with transportation in commerce.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR Subparts C, D and E of Part 172 in that shipping papers, marking and labeling are not required for batteries already excepted by § 173.185(c) and § 172.102(c) Special Provision 130; § 172.102(c) Special Provisions 130(d) in that batteries utilizing different chemistries (i.e., those battery chemistries specifically covered by another entry in the



Continuation of DOT-SP 14849 (4th Rev.)

Page 2

**June 30, 2015**

§ 172.101 Table) as well as dry batteries may be combined with used or spent batteries in the same package; § 173.159a(c)(2) in that marking the battery and outer packaging is waived; § 173.185(c)(1)(iii), (c)(1)(iv), (c)(1)(v) and (c)(3) in that alternative marking and documentation are authorized and alternative means of identifying any special procedures to be followed in the event a package is damaged is authorized, as provided herein.

5. BASIS: This special permit is based on the application of Call2Recycle, Inc. dated February 3, 2015, submitted in accordance with § 107.105 and the public proceeding thereon.

6. HAZARDOUS MATERIALS (49 CFR § 172.101):

Hazardous Materials Description			
Proper Shipping Name	Hazard Class/Division	Identification Number	Packing Group
Lithium metal batteries including lithium alloy batteries	9	UN3090	N/A
Lithium ion batteries including lithium ion polymer batteries	9	UN3480	N/A
Lithium ion batteries, contained in equipment including lithium ion polymer batteries	9	UN3481	N/A
Lithium ion batteries, packed with equipment including lithium ion polymer batteries	9	UN3481	N/A
Lithium metal batteries, contained in equipment including lithium alloy batteries	9	UN3091	N/A



Continuation of DOT-SP 14849 (4th Rev.)

Page 3

June 30, 2015

Hazardous Materials Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Lithium metal batteries, packed with equipment <i>including lithium alloy batteries</i>	9	UN3091	N/A
Batteries, wet, non-spillable	8	UN2800	N/A
Batteries, dry, sealed, n.o.s.	See Special Provision 130		

7. SAFETY CONTROL MEASURES:

a. PACKAGING - Prescribed packaging is a non-DOT specification fiberboard box that is capable of withstanding a 1.2 meter drop test in any orientation -

- without damage to cells or batteries contained in the package;
- without shifting of the contents that would allow short circuiting; and
- without release of package contents.

b. Each fiberboard box must be printed with instructions for complying with the requirements of this special permit.

c. Each package must be marked "Used Batteries for Recycling: May Contain Lithium (ion) and Non-spillable Batteries. FOR HIGHWAY OR VESSEL TRANSPORT ONLY - FORBIDDEN FOR TRANSPORTATION BY AIRCRAFT" at least 6mm (.25 inch) in height.

d. Each package must be marked with an emergency response telephone number accessible 24 hours per day in case of damage to the packaging or contents.

e. Each package must be marked with the special permit number as required by 49 CFR 172.301(c).





Continuation of DOT-SP 14849 (4th Rev.)

Page 4

**June 30, 2015**

**8. OPERATIONAL CONTROLS:**

a. The grantee must provide each person who packages materials in boxes subject to this special permit detailed instructions on the requirements of the special permit and packaging batteries for transport. The instructions must be displayed where the packages are closed for transportation and must at a minimum communicate each requirement of paragraph 8.b. through 8.h. and 9.c. of this special permit.

b. This packaging is to be used only authorized for battery disposal or recycling purposes.

c. Lithium metal batteries transported in this packaging are limited to 25 grams of lithium per battery. Lithium ion batteries are limited to 300 Watt-hours. Non-spillable batteries are limited to 25 pounds or less gross weight each.

d. Lithium ion, lithium metal, non-spillable batteries and dry cell batteries (dry cell batteries with a marked rating over 9 volts and alkaline batteries with a marked rating over 12 V) must be protected against short circuits. Some suitable methods of protection the batteries against short circuits include, but are not limited to, placing the batteries in individual plastic bags; or taping and covering the exposed terminals. The means of protection used to prevent short circuits must remain in place while the packages are in transportation.

e. Electrical devices must be protected against short circuits and unintentional activation.

f. The gross weight of the package may not exceed 30 kg (66 pounds).

g. Packages must be stored away from heat.

h. Each package must be securely closed prior to being offered for transportation.

i. When utilized as specified in these instructions, the completed package is excepted from the requirements of Subparts C, D and E of Part 172 (shipping papers, marking and labeling respectively).



Continuation of DOT-SP 14849 (4th Rev.)

Page 5

June 30, 2015

j. If the packaging is used to transport non-spillable batteries, the batteries and package are excepted from the marking requirements for non-spillable batteries in § 173.159a(c)(2).

k. The testing requirements for lithium batteries under § 173.185(a)(1) are waived.

9. SPECIAL PROVISIONS:

a. In accordance with the provisions of Paragraph (b) of § 173.22a, persons may use the packaging authorized by this special permit for the transportation of the hazardous materials specified in paragraph 6, only in conformance with the terms of this special permit.

b. A person who is not a holder of this special permit, but receives a package covered by this special permit, may offer it for transportation provided it is offered for transportation in conformance with this special permit and the HMR.

c. A person offering a package covered by this special permit to a motor carrier must notify the operator of the motor vehicle of the presence of hazardous materials and that in the event of damage, the emergency response number, and emergency procedures applicable to the motor carrier appear on the package.

d. A current copy of this special permit must be accessible from each facility where the package is offered for transportation (computer generated is acceptable). In addition, a copy of the special permit must be available on the grantees website.

e. Each packaging manufactured under the authority of this special permit must be either (1) marked with the name of the manufacturer and location (city and state) of the facility at which it is manufactured or (2) marked with a registration symbol designated by the Office of Hazardous Materials Special Permits and Approvals for a specific manufacturing facility.



Continuation of DOT-SP 14849 (4th Rev.)

Page 6

**June 30, 2015**

f. The grantee must keep on file and make available upon request annual reports from box inspections conducted at locations where batteries are consolidated and/or processed. These reports must include all noted non-compliance with the HMR and/or this special permit and actions taken to prevent recurring of such non-compliance.

g. A list of companies that have been provided these packagings must be maintained and made available upon request.

10. MODES OF TRANSPORTATION AUTHORIZED: Motor Vehicle and Cargo Vessel. Cargo vessel is authorized only to and from Alaska, Hawaii, Guam, Puerto Rico and the Virgin Islands.
11. MODAL REQUIREMENTS: None, as a requirement of this special permit.
12. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this special permit and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq.
  - o All terms and conditions prescribed in this special permit and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
  - o Persons operating under the terms of this special permit must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.
  - o Registration required by § 107.601 et seq., when applicable.

No person may use or apply this special permit, including display of its number, when this special permit has expired or is otherwise no longer in effect.

Under Title VII of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)–“The Hazardous Materials Safety and Security Reauthorization Act of 2005” (Pub. L. 109-59), 119 Stat. 1144 (August 10, 2005), amended the Federal hazardous materials transportation law by changing the term “exemption” to “special permit” and authorizes a special permit to be granted up to two years for new special permits and up to four years for renewals.



Continuation of DOT-SP 14849 (4th Rev.)

Page 7

**June 30, 2015**

13. REPORTING REQUIREMENTS: Shipments or operations conducted under this special permit are subject to the Hazardous Materials Incident Reporting requirements specified in 49 CFR §§ 171.15 - Immediate notice of certain hazardous materials incidents, and 171.16 - Detailed hazardous materials incident reports. In addition, the grantee(s) of this special permit must notify the Associate Administrator for Hazardous Materials Safety, in writing, of any incident involving a package, shipment or operation conducted under terms of this special permit.

Issued in Washington, D.C.:

*Niane LaValle*

for Dr. Magdy El-Sibaie  
Associate Administrator for Hazardous Materials Safety

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Pipeline and Hazardous Material Safety Administration, U.S. Department of Transportation, East Building PHH-30, 1200 New Jersey Avenue, Southeast, Washington, D.C. 20590.

Copies of this special permit may be obtained by accessing the Hazardous Materials Safety Homepage at [http://hazmat.dot.gov/sp\\_app/special\\_permits/spec\\_perm\\_index.htm](http://hazmat.dot.gov/sp_app/special_permits/spec_perm_index.htm) Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

PO: LAVALLE/SG



G. Flow chart of battery movement from site to recycling facility

## Call2Recycle Physical Flow: United States

### 1 COLLECTION

Public Agencies  
Retailers  
Businesses  
Municipalities

### 2 SORTING

Recording and sorting by chemistry

INMETCO Ellwood City, PA

### 3 PROCESS & RECOVERY

Processed by chemistry type

Single-Use Batteries

**INMETCO**

Ellwood City, PA

METALS RECLAIMED AT INMETCO INCLUDE CADMIUM, AND A NICKEL, CHROMIUM, IRON MIXTURE PRODUCING A STAINLESS STEEL REMELT ALLOY USED BY SPECIALTY STEEL MANUFACTURERS. THE ZINC-RICH MATERIAL IS SENT FOR FURTHER PROCESSING AND RECOVERY OF ZINC AND ZINC OXIDE.





## H. Processor and sorting qualification standards

These qualification standards define the minimum operating requirements to qualify as a processor and/or a sorter of batteries, cell phones and other materials collected for the Call2Recycle® program.

The following standards do not absolve any processor or sorting facility from any federal, provincial/state and/or municipal legislation and regulations applicable to their operation. It is their responsibility to be aware of and abide by all such legislation and regulations.

### Processor Standards

1. Comply with all business licensing and permitting requirements as well as any local, state/provincial and federal environmental operating permit requirements, such as but not limited to, recycling, hazardous waste/material management, storage and treatment, air quality, water quality, import/export permits and any special conditions set forth in the licenses and/or permits, including but not limited to:
  - Ministry of the Environment Federal and Provincial- Certificates of Approval; Ontario *Environmental Protection Act*, 1990 (including R.R.O. 1990, O. Reg. 347, General – Waste Management) and Federal Permit of Equivalent Level of Environmental Safety;
  - *Transportation of Dangerous Goods Act* (TDGA);
  - Export and Import of Hazardous Waste and Hazardous Recyclable Material Regulations, 2005 (EIHWHRMR) under the Canadian Environmental Protection Act;
  - United States Environmental Protection Agency (USEPA);
  - United States Department of Transportation (USDOT);
  - International Civil Aviation Organization (ICAO)
2. Complete and pass a qualification audit of the facility performed by CHWMEG (in past 3 years) or outside auditor chosen by Call2Recycle. To ensure the facility is in compliance with all regulatory and performance requirements. Call2Recycle and program participants shall be allowed to audit the facility in-person at mutually agreeable specified times. The most recent facility audit summary shall be provided within seven days to Call2Recycle, program participants, auditors or regulators upon request.
3. Possess workers' compensation coverage, comprehensive or commercial general liability insurance, including coverage for bodily injury, property damage, complete operations, contractual liability, and closure. With combined single limits of not less than \$1,000,000 per occurrence, \$4,000,000 general aggregate.
4. Possess environmental liability insurance with \$5,000,000 aggregate limit.
5. Maintain a written policy approved by senior management outlining corporate commitment to environmental management and continuous improvement.
6. Comply with Call2Recycle's certification requirements under the applicable collection and recycling certification programs not to ship waste batteries to non-OCED countries, i.e. BAN, R2 and The Electronic Processors Stewardship Canadian (EPSC) Recycler Qualification Program for End-of-Life Electronics Recycling. Identify and provide copies of exiting certifications, i.e. ISO 14001, operating



permits and provide notification if discontinued. Provide documentation -- such as EHS Summary and facility audits -- showing that the company's management standards meet the required certification criteria. Willingness to complete and sign audit forms that may be requested as part of Call2Recycle's certification or program participant's certifications.

7. Implement and maintain an emergency response plan to prepare for and respond to emergency situations, including fires, spills, information system interruptions, and medical emergencies. Provide immediate notification of any situation that may affect the facility, surrounding area or the Call2Recycle program. A verbal reporting of an incident must be provided to Call2Recycle within 24 hours, with a full written description -- including any corrective measures -- within 15 days.
8. Identify, plan for, and comply with all applicable occupational health and safety regulations. Include within the plans the Identification and management for the potential overheating due to short circuiting as well as the potential for hydrogen gas to vent from the batteries.
9. Document the receipt, flow and handling of materials from receipt at facility through final disposition. Documentation shall include but not be limited to descriptions regarding how the materials are received, tracked, sorting procedures and tracking documentation for downstream processor(s).
  - a. Responsible for packaging, transporting and ensuring a downstream facility has been audited and assumes responsibility for materials sent offsite for further processing.
  - b. Provide copies of all shipping documents, receipt acknowledgments, and certificates of conversion/recycling for materials processed through final disposal facilities. Sorter shall provide shipping documents related to off-site shipments within 2 business days of shipment.
  - c. Batteries must be processed within 180 days of receipt of battery (please note some regs require 1 year).
10. Maintain all records for a minimum of three years, or as required by regulation, including manifests, bills of lading and waste records.
11. Provide notice of any fines or regulatory orders in the previous five years and within 60 days of any subsequent fine or regulatory order.
12. Allow services and information to be subject to audits at the discretion of Call2Recycle or a representative on behalf of Call2Recycle.
13. Provide annually assurance of financial stability including the ability to pay bills, in the form of audited financial statements, Dunn Bradstreet rating or comparable 3<sup>rd</sup> party reports.
14. Meet EU Battery Directive 2006/66/EC or Provincial recycling efficiency and/or recycling rate requirements, whichever is most stringent.

#### **Receiving, Sorting and Consolidation Standards**

**Include the above requirements (Except 9C and 14)**



1. Enter all shipping containers received as part of the Call2Recycle program in a Call2Recycle data collection system within five (5) business days of receipt. Data such as collection site information, shipment tracking and battery/cell phone composition will be entered into Call2Recycle information system. This system requires a “business class” level internet connection at a minimum.
  - Containers are brought into sorting room and scan the label (enter Site ID number) into the Call2Recycle data base using a bar code scanner and verifies acceptance.
  - Operator weighs box, record to site ID box size and total box weight.
  - Operator observes and notes the conditions of box receipt (BAR- box anomaly report); intact box, terminal protection, foreign objects, wet cell batteries, leaking/burn marks on batteries.
  - Operator empties box, sorts by chemistry (examples Ni-Cd, Ni-MH, Li- ion, SSLA, Ni-Zn, Li, Alkaline and cell phones) obtain weight each chemistry (note that this process may change for all battery chemistry collection if not needed by individual chemistry weights).
  - Remove batteries from agreed upon electronic items and sort by chemistry.
  - Operator enters data for the box into the Call2Recycle data system.
2. Provide a reconciled daily container inventory, within a 2% error rate.
3. Sort, verify and submit batteries received in bulk loads to Call2Recycle for recording within 5 business days with the following exception:
  - Mixed battery chemistries, that have not been pre-sorted, and weighing over 10,000 lbs. shall be processed within 15 business days
4. Properly handle batteries for downstream shipment including:
  - Protect terminals when required.
  - Pack batteries into appropriate shipping containers.
  - Label and mark containers.
  - Complete shipping documentation.
  - Arrange for transportation to agree upon downstream facilities.
5. Meet federal, provincial and international shipping regulations including terminal protection and any applicable special requirements.
6. Ship sorted batteries to processor(s) when accumulated batteries reach truckload quantities (approximately 40,000 pounds) or within 180 days, whichever comes first.
7. Record and report non-compliant packaged shipments within 5 business days of receipt.
8. Appropriately dispose of all materials collected through the Call2Recycle program that is not part of the program (“non-conforming material”), consistent with all local, state and federal requirements. Provide documentation on disposal upon request.
9. Use or recycle packaging materials such as boxes, bags, shrink wrap and drums; provide recycling documentation upon request.



# I. R2 2013 certificate



## PERRY JOHNSON REGISTRARS, INC.

### Certificate of Registration

*Perry Johnson Registrars, Inc., has audited  
the Environmental, Health and Safety Management System of:*

**Call2Recycle, Inc.**  
 1000 Parkwood Circle, Suite 200, Atlanta, GA 30339 United States

*The organization has been audited by a certification body that is in conformance with ISO/IEC  
17021 requirements and applicable Accreditation Body requirements. The organization is found to be  
in conformance with the R2 Standard as applied by the R2 Code of Practices.*

**Responsible Recycling® (R2) Rev. 7/2013**

*This Registration is in respect to the following scope:*

**Management of the Collection, and the Distribution to Downstream  
Processors, for the Recycling of Batteries and Cell Phones**

(Non-Applicable Provisions: 4. On-Site Environmental, Health, and Safety; 9. Storage; 10. Security; and 11. Closure Plan and Financial Responsibility)

*This Registration is granted subject to the system rules governing the Registration referred to above, and the  
Organization hereby covenants with the Assessment body duty to observe and comply with the said rules.*



**PERRY JOHNSON  
REGISTRARS, INC.**



**Responsible Recycling  
R2**



**ANAB  
ACCREDITED**



**Terry Boboige, President**

Perry Johnson Registrars, Inc. (PJR)  
755 West Big Beaver Road, Suite 1340  
Troy, Michigan 48064  
(248) 358-3388

*The validity of this certificate is dependent upon ongoing surveillance.*

Effective Date:  
December 22, 2014

Expiration Date:  
December 21, 2017

Certificate No.:  
C2014-02500



## J. ISO 14001 certificate

	<h1>PERRY JOHNSON REGISTRARS, INC.</h1>
<h2>Certificate of Registration</h2>	
<p><i>Perry Johnson Registrars, Inc., has audited the Environmental Management System of:</i></p>	
<p><b>Call2Recycle, Inc.</b> 1000 Parkwood Circle, Suite 200, Atlanta, GA 30339 United States</p>	
<p><i>(Hereinafter called the Organization) and hereby declares that Organization is in conformance with:</i></p>	
<p><b>ISO 14001:2004</b></p>	
<p><i>This Registration is in respect to the following scope:</i></p>	
<p><b>Management of the Collection, and the Distribution to Downstream Processors, for the Recycling of Batteries and Cell Phones</b></p>	
<p><i>This Registration is granted subject to the system rules governing the Registration referred to above, and the Organization hereby covenants with the Assessment body duty to observe and comply with the said rules.</i></p>	
 	
<p><i>Terry Boboige</i> Terry Boboige, President Perry Johnson Registrars, Inc. (PIR) 755 West Big Beaver Road, Suite 1340 Troy, Michigan 48064 (248) 358-3388</p>	
<p><small>The use of the UKAS accreditation symbol is in respect to the activities covered by the Accreditation Certificate Number 0105. The validity of this certificate is dependent upon ongoing surveillance.</small></p>	
<p><small>Effective Date:</small> October 8, 2014</p>	<p><small>Expiration Date:</small> October 7, 2017</p>
<p><small>Certificate No.:</small> C2014-02502</p>	





# K. OHSAS 18001 certificate



## PERRY JOHNSON REGISTRARS, INC.

### *Certificate of Registration*

*Perry Johnson Registrars, Inc., has audited  
the Occupational Health and Safety Management System of:*

**Call2Recycle, Inc.**  
*1000 Parkwood Circle, Suite 200, Atlanta, GA 30339 United States*

*(Hereinafter called the Organization) and hereby declares that  
Organization is in conformance with:*

**OHSAS 18001:2007**

*This Registration is in respect to the following scope:*

**Management of the Collection, and the Distribution to Downstream  
Processors, for the Recycling of Batteries and Cell Phones**

*This Registration is granted subject to the system rules governing the Registration referred to above, and the  
Organization hereby covenants with the Assessment body duty to observe and comply with the said rules.*




  
 Terry Boboige, President  
 Perry Johnson Registrars, Inc. (PIJR)  
 755 West Big Beaver Road, Suite 1340  
 Troy, Michigan 48064  
 (248) 358-3388

*The use of the UKAS accreditation symbol is in respect to the activities  
covered by the Accreditation Certificate Number 0105.*

*The validity of this certificate is dependent upon ongoing surveillance.*

<i>Effective Date:</i>	<i>Expiration Date:</i>	<i>Certificate No.:</i>
October 8, 2014	October 7, 2017	C2014-02503



## L. List of collection sites

Account Name	Address	County	Contact Information	Open to consumers for drop off
R.K. Miles, Inc.	88 Exchange St Middlebury, VT 05753-1196	Addison	Store Manager (802) 385-1135	Yes
Martin's Hardware & Building Supply	859 Route 7 S Middlebury, VT 05753-8998	Addison	Pawul, John 8023889500 22b947@gmail.com	Yes
Addison County Solid Waste District	1223 Route 7 S Middlebury, VT 05753-8800	Addison	Maglienti, Donald 8023882333 Don@acswmd.org	Yes
Basin Harbor Club	4800 Basin Harbor Rd Vergennes, VT 05491-8521	Addison	Goodyear, Brian 8024757803 brian@basinharbor.com	No
Martins Hardware	68 West St Bristol, VT 05443-1225	Addison	Emerson, Kayla 8024533617 kpawvl@gmail.com	Yes
R.K. Miles, Inc.	618 Depot St Manchester Center, VT 05255-9807	Bennington	Dupuis, Zack (802) 362-1952X616	Yes
Staples	5 Kocher Dr Bennington, VT 05201-1924	Bennington	Store Manager (802) 442-3919	Yes
RadioShack	103 Bennington Sq Bennington, VT 05201-1941	Bennington	Store Manager (802) 442-3002	No
Town of Pownal	467 Center St Pownal, VT 05261-9637	Bennington	Percey, Hap 802-780-7919 Hapsltop@comcast.net	Yes
Home Depot	121 N Bennington Rd Bennington, VT 05201-1645	Bennington	Operations ASM (802) 447-9997	Yes
Town of Bennington Rescue Squad	120 McKinley St Bennington, VT 05201-1823	Bennington	Hathaway, William 8024425817 bennresq@comcast.net	No
Walmart - WM	210 Northside Dr Ste 1 Bennington, VT 05201-1751	Bennington	Claims Department (802) 447-1614	No
Southwestern Vermont Medical Center	100 Hospital Dr Bennington, VT 05201-5013	Bennington	Bink, Lois (802)447-5364 Lois.Bink@svhealthcare.org	No
Center Hill 3 Electronics Inc.	30 VT Route 11 Manchester Center, VT 05255-9424	Bennington	Store Manager (802) 362-1784	Yes



Account Name	Address	County	Contact Information	Open to consumers for drop off
Northeast Kingdom Waste Mgt District	224 Church St Lyndonville, VT 05851-9616	Caledonia	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD - Waterford Recycling	Duck Pond Rd Lower Waterford, VT 05819	Caledonia	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
RadioShack	1998 Memorial Dr Ste 12 Saint Johnsbury, VT 05819-8698	Caledonia	Store Manager 8027488254 tanman05851@gmail.com	No
Poulin Lumber	439 Wolcott St Hardwick, VT 05843	Caledonia	Store Manager (802) 472-5581	Yes
UPS	1028 Industrial Pkwy Saint Johnsbury, VT 05819-8956	Caledonia	Bedor, Amy (802) 748-9911	No
NEKWMD Barnet Recycling Ctr	End of Town Highway 14 Saint Johnsbury, VT 05819-8590	Caledonia	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD Danville Recycling Ctr	279 Highland Ave Danville, VT 05828-9667	Caledonia	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD Newark Recycling Ctr	1358 Newark St West Burke, VT 05871-9733	Caledonia	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD Peacham Recycling Ctr	Town Highway #2 E Peacham, VT	Caledonia	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD - Ryegate Recycling Ctr	269 School St East Ryegate, VT 05042	Caledonia	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD - Wheelock Recycling	Route 122 Lyndonville, VT 05851-6000	Caledonia	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
Best Buy	26 Cypress St Williston, VT 05495-8209	Chittenden	Wolynski, Jorge (802) 872-0992 jorge.wolynski@bestbuy.com	Yes
Chittenden Solid Waste District	1011 Airport Pkwy South Burlington, VT 05403-5804	Chittenden	Winnie, Gary 8028654663 Gwinnie@cswd.net	Yes
Milton Ace Hardware	380 Route 7 S Milton, VT 05468-4590	Chittenden	Tummons, Walt 8028934100	Yes
Lowe's	10 Susie Wilson Rd Essex Junction, VT 05452-2807	Chittenden	Tina (802) 662-9131	Yes
Russell Supply	9 Gregory Dr South Burlington, VT 05403-6061	Chittenden	Store Manager (802) 863-1177	Yes



Account Name	Address	County	Contact Information	Open to consumers for drop off
Verizon Wireless	825 Williston Rd South Burlington, VT 05403-5716	Chittenden	Store Manager (802) 865-3100	Yes
RadioShack	580 Shelburne Rd Ste 11 Burlington, VT 05401-6904	Chittenden	Store Manager (802) 862-0044	No
UPS	454 Harvest Ln Williston, VT 05495-7270	Chittenden	Polhemus, Kyle (802)8797146 KPolhemus@UPS.com	No
Home Depot	759 Harvest Ln Williston, VT 05495-7269	Chittenden	Operations ASM (802) 872-0039	Yes
RadioShack	155 Dorset St Ste B5 South Burlington, VT 05403-6280	Chittenden	Omorrow, Matthew 8027735387 matthewomorrow@yahoo.com	No
University Of Vermont	667 Spear St Burlington, VT 05405-1734	Chittenden	Medor, Brian 8026565408 bmedor@uvm.edu	No
UPS	454 Harvest Ln Williston, VT 05495-7270	Chittenden	Maskell, Lorie 8028797146 nne3lsm@ups.com	No
Fletcher Allen Healthcare	111 Colchester Ave Burlington, VT 05401-1416	Chittenden	Fortin, Marcel marcel.fortin@vtmednet.org	No
Vermont Air National Guard	30 Falcon St South Burlington, VT 05403-5864	Chittenden	Dufault, Peter 8026605926 peter.dufault@ang.af.mil	No
Sears	155 Dorset St South Burlington, VT 05403-6346	Chittenden	Drollette, Ryan 8028592011 ryan.drollette@searshc.com	Yes
Lowe's	189 Hanneford Dr South Burlington, VT 05403-6956	Chittenden	Donnelly, Brian 8023189052	Yes
Burlington Tool Repair	3 Kellogg Rd Essex Junction, VT 05452-2801	Chittenden	Desiree (802) 872-0051	Yes
Richmond Elementary	125 School St Richmond, VT 05477-9033	Chittenden	Carini, Jed 8024342461 jed.carini@cesu.k12.vt.us	No
Grainger	20 Gregory Dr South Burlington, VT 05403-6046	Chittenden	Branch Manager (802) 658-4988	Yes



Account Name	Address	County	Contact Information	Open to consumers for drop off
Hotronic USA Inc.	25 Omega Dr Ste 130 Williston, VT 05495-7334	Chittenden	Bashaw, Jennifer (802) 862-7403 warehouse@hotronic.com	No
Stephen Barton	5 Beartown Rd Underhill Center, VT 05490	Chittenden	Barton, Stephen 8023631100 sbarton@makitausea.com	No
State of VT Military Dept, VT Army Guard	789 National Guard Rd Colchester, VT 05446-3046	Chittenden	Banks, Lee Ann 8023383327 leeann.banks@state.vt.us	No
The Radio North Group	12 Gregory Dr Ste 4 South Burlington, VT 05403-6058	Chittenden	Store Manager (802) 865-0090	Yes
Essex Equipment	26 Kellogg Rd Essex Junction, VT 05452-2806	Chittenden	Store Manager (802) 879-0767	Yes
Kinney Drugs Inc	10212 Route 116 Hinesburg, VT 13642	Chittenden	Store Manager (802) 482-4886	Yes
Kinney Drugs Inc	800 Us Rt. 302-Berlin Barre, VT 05641	Chittenden	Store Manager (802) 476-6659	Yes
NWSWD - Fletcher	125 Cambridge Rd Westford, VT 05494-9520	Chittenden	Leddy, John 8025245986 jleddy@nswswd.org	Yes
Burlington Drop-Off Center	339 Pine St Burlington, VT 05401-4739	Chittenden	Leddy, John (802) 863-3827	Yes
Essex Drop-Off Center	218 Colchester Rd Essex Junction, VT 05452-2405	Chittenden	Leddy, John (802) 878-3152	Yes
Milton Drop-Off Center	36 Landfill Rd Milton, VT 05468-3886	Chittenden	Leddy, John(802) 893-6551	Yes
Hinesburg Drop-Off Center	907 Beecher Hill Rd Hinesburg, VT 05461-9135	Chittenden	Leddy, John (802) 482-4840	Yes
Richmond Drop-Off Center	80 Rogers Ln Richmond, VT 05477-7748	Chittenden	Leddy, John (802) 434-2712	Yes
South Burlington Drop-Off Ctr	87 Landfill Rd South Burlington, VT 05403-5702	Chittenden	Leddy, John (802) 865-6221	Yes
Williston Drop-Off Center	1492 Redmond Rd Williston, VT 05495-7701	Chittenden	Leddy, John (802) 872-7109	Yes





Account Name	Address	County	Contact Information	Open to consumers for drop off
RadioShack	60C Pearl St Essex Junction, VT 05452-3620	Chittenden	Store Manager (802) 878-2366	No
NEKWMD Brighton Recycling Ctr	621 Railroad St Island Pond, VT 05846-9626	Essex	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD Concord Recycling Ctr	110 Brook Rd Concord, VT 05824	Essex	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD Lunenburg Recycling Ctr	Transfer Station Rd Lunenburg, VT 05906	Essex	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD Norton Recycling Ctr	249 VT Route 114 S Norton, VT 05907	Essex	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
Northwestern Medical Center	133 Fairfield St Saint Albans, VT 05478-1726	Franklin	Reinfurt, Chris 8025248464 creinfurt@nmcinc.org	No
Green's Ace Hardware	6 Railroad St Enosburg Falls, VT 05450	Franklin	Manager, Store 8029337500	Yes
NWSWD - Montgomery	86 Mountain Rd Montgomery Center, VT 05471-3130	Franklin	(802)524-5986 info@nswsd.org	Yes
Northwest Vermont Solid Waste Mgmt District	158 Morse Rd Fairfax, VT 05454-4448	Franklin	Leddy, John 8025245986 jleddy@nswsd.org	Yes
Walmart - WM	700 Tuckers Way Saint Albans, VT 05478-2628	Franklin	Claims Dept (802) 528-4110	No
RadioShack	317 Swanton Rd Saint Albans, VT 05478-2609	Franklin	Store Manager 802-524-5880 alissa.albro@gmail.com	No
NWSWD - St. Albans City	83 Rewes Dr Saint Albans, VT 05478-2000	Franklin	(802)524-5986 info@nswsd.org	Yes
NWSWD - Bakersfield	380 Main St Route 108 Bakersfield, VT 05441-9998	Franklin	(802)524-5986 info@nswsd.org	Yes
Town of Alburgh	1 N Main St Alburgh, VT 05440-4404	Grand Isle	Mashtare, Amy 8027963468 AMashtare25@outlook.com	Yes
NWSWD - North Hero	362 W Shore Rd North Hero, VT 05486-4514	Grand Isle	(802)524-5986 info@nswsd.org	Yes
Country Home Center	85 Center Rd Morrisville, VT 05661-8585	Lamoille	Store Manager (802) 888-3177	Yes
Ward's Systems Inc.	65 Northgate Plz Morrisville, VT 05661-6099	Lamoille	Store Manager (802) 888-4163	Yes



Account Name	Address	County	Contact Information	Open to consumers for drop off
Lamoille Regional SWMD	29 Sunset Dr Ste 5 Morrisville, VT 05661-8313	Lamoille	Majors, Joyce 802.888.7317 info@lrswwmd.org	No
Tool Barn, Inc	2320 US Route 5 N Fairlee, VT 05045-9752	Orange	Perry, Dan 8023339311	Yes
NEKWMD Corinth Recycling Ctr	2398 Goose Green Rd Bradford, VT 05033	Orange	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD - Westfield Recycling	757 VT Route 100 Westfield, VT 05874-9666	Orleans	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
Poulin Lumber Inc	3639 US Route 5 Derby, VT 05829-9490	Orleans	Store Manager (802) 766-4971	Yes
Columbia Forest Products	115 Columbia Way Newport, VT 05855-5496	Orleans	MERRILL, RON 8023346711 rmerrill@cfpwood.com	No
Newport Ambulance Inc	830 Union St Newport, VT 05855-5523	Orleans	Johansen, Jeff 8023342023 lgdodgett@yahoo.com	Yes
Claude's TV Sales & Svc Inc	24 3rd St Newport, VT 05855-2213	Orleans	Delabruere, David 8023347074 claudestv@hotmail.com	Yes
NEKWMD Albany/Irasburg Depot	161 Route 58 E Irasburg, VT 05845-9666	Orleans	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD Derby Recycling Ctr	3427 US Route 5 Derby, VT 05829	Orleans	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD Glover Recycling Ctr	1600 Dry Pond Rd Glover, VT 05839	Orleans	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD Greensboro Recycling Ct	Town Hwy 8 Greensboro, VT 05841	Orleans	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD Jay Recycling Ctr	1375 Cross Rd North Troy, VT 05859-9818	Orleans	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD Holland Recycling Ctr	3157 Valley Rd Holland, VT 05830	Orleans	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD Morgan Recycling Ctr	285 Hatton Hts Morgan, VT 05853-9601	Orleans	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD Newport Town Recycling	Rt 105, The Old Town Garage Newport Town, VT 05857	Orleans	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NEKWMD - Westmore Recycling	6988 VT Route 5A Westfield, VT 05860	Orleans	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes



Account Name	Address	County	Contact Information	Open to consumers for drop off
RadioShack	150 Diamond Run Mall Rutland, VT 05701-4922	Rutland	Store Manager (802) 773-5387	No
RadioShack	316 S Main St Rutland, VT 05701-4907	Rutland	Store Manager (802) 775-5617	No
Solid Waste Alliance Communities	376 Old N Lake Rd Benson, VT 05743-9477	Rutland	Clapp, Pam 5188549702 pam@rutlandcountyswac.org	Yes
Home Depot	299 US Route 4 E Rutland, VT 05701-9034	Rutland	Operations ASM (802) 786-6900	Yes
Basin Ski Shop	2886 Killington Rd Killington, VT 05751-9733	Rutland	Hodge, Rob 8024223234 boots@basinski.com	No
UPS	125 Park St Rutland, VT 05701-4710	Rutland	Gravelle, Donna 8027755224 DGravelle@UPS.com	No
Rutland Regional Medical Center	160 Allen St Rutland, VT 05701-4595	Rutland	Heleba, Daniel (802) 747-3662	No
Walmart - WM	1 Rutland Shopping Plz Rutland, VT 05701-5200	Rutland	Claims Department (802) 773-0200	No
Fastenal	275 N Main St Rutland, VT 05701-2414	Rutland	Branch Manager (802) 747-7722	Yes
Central Vermont Solid Waste Mgmt Dist	137 Barre St Montpelier, VT 05602-3618	Washington	Witke, Carl 802 229 9383 carlw@cvswwmd.org	Yes
Bob's Camera & Video	86 N Main St Barre, VT 05641-4120	Washington	Store, Manager (802) 476-4342	Yes
Waterbury True Value Hardware	838 Waterbury Stowe Rd Waterbury, VT 05676-9730	Washington	Store Manager (802) 244-8905	Yes
Bisbee's Hardware	109 Mad River Vw Waitsfield, VT 05673-7297	Washington	Store Manager (802) 496-3635	Yes
Nelson's Ace Hardware	190 N Main St Barre, VT 05641-4124	Washington	Store Manager (802) 476-5700	Yes
NLS/BPH	R R #4 Box 1870 Montpelier, VT 05602	Washington	Special Services Unit (202) 707-9298	No
Vermont Department of Public Safety	409 US Route 2 Montpelier, VT 05602-8867	Washington	Oparowski, Peter (802) 229-0882	No
Reynolds & Son Inc.	47 Bridge St South Barre, VT 05670	Washington	Medico, Chris 3867747305 rs9840@gmail.com	Yes



Account Name	Address	County	Contact Information	Open to consumers for drop off
RadioShack	1400 US Route 302 Ste 4 Barre, VT 05641-4459	Washington	McLaughlin, Brian 8024765163 Brianheatherjac@yahoo.com	No
Hunger Mountain Co-op	623 Stone Cutters Way Montpelier, VT 05602-3635	Washington	Leonard, Krissy 8022238000 krissyl@hungermountain.com	Yes
KENYON'S HARDWARE AND FARM SUPPLY	93 N Main St Northfield, VT 05663-6742	Washington	KRISTY, 8024859676 kristykenyon@wcvr.com	Yes
Hunger Mountain Co-op	623 Stone Cutters Way Montpelier, VT 05602-3635	Washington	Keene, Sonia 802-223-8000 soniak@hungermountain.coop	Yes
Washington Electric Cooperative	40 Church Street East Montpelier, VT 05651-4133	Washington	Gray, Mike 8022235246 mike.gray@wec.coop	No
City of Barre	6 N Main St Ste 6 Barre, VT 05641-4114	Washington	Dawes, Carol 8024760242 cdawes@barrecity.org	Yes
Staples	160 Paine Tpke N Ste 2 Berlin, VT 05602-8293	Washington	(802) 223-3770	Yes
NEKWMD Cabot Recycling Ctr	153 Sawmill Rd Lower Cabot, VT	Washington	Berry, Marcus (802) 626-3532 outreach@nekwmd.org	Yes
NLS/BPH	578 Paine Tpke N Montpelier, VT 05602-9139	Washington	(202) 707-9892	No
Windham Solid Waste Management District	327 Old Ferry Rd Brattleboro, VT 05301-9175	Windham	MacDonald, Will (802) 257-0272	Yes
J & H Do It Best	20 The Sq Bellows Falls, VT 05101-1335	Windham	Store Manager (802) 463-4140	Yes
BRW ELECTRONICS	972 Putney Rd Unit 9 Brattleboro, VT 05301-8881	Windham	Store Manager (802) 257-5229	Yes
Staples	768 Putney Rd Brattleboro, VT 05301-9005	Windham	Store Manager (802) 257-5596	Yes
Leader Home Centers	225 Marlboro Rd Brattleboro, VT 05301-9724	Windham	Store Manager 8022577373 info@leaderhome.com	Yes
Brattleboro Public Works	211 Fairground Rd Brattleboro, VT 05301-6327	Windham	King, Gary (802) 254-4255	No



Account Name	Address	County	Contact Information	Open to consumers for drop off
Londonderry Solid Waste Group	100 Old School St South Londonderry, VT 05155-9285	Windham	Fishman, Esther 8028243356 londonrecycle@vermontel.net	Yes
Brown & Roberts Ace Hardware	182 Main St Brattleboro, VT 05301-2892	Windham	Store Manager (802) 257-4566	Yes
Londonderry Hardware	5700 VT Route 100 Londonderry, VT 05148-9537	Windham	Store Manager (802) 824-3926	Yes
Londonderry Transfer Station	7060 Route 100 Londonderry, VT 05148-9555	Windham	Fishman, Esther (802) 824-5506	Yes
Rockingham Recycling Ctr	7446 US Route 5 Westminster, VT 05158-9680	Windham	DeRosia, Gary (802) 463-9219	Yes
Greater Upper Valley Solid Wast District	96 Mill Street North Hartland, 05052	Windsor	Tibbals, Bryan (802) 296-3688	Yes
Woodstock Ace Hardware	452 Woodstock Rd Woodstock, VT 05091-9759	Windsor	Store Manager (802) 457-3291	Yes
Hartford Recycling Center	2590 N Hartland Rd White River Junction, VT 05001-9819	Windsor	Stockman, Wanda 8022955740 WStockman@Hartford-VT.org	Yes
VA Medical Center (138)	215 N Main St White River Junction, VT 05009-0001	Windsor	Rowland, Mary 8022959363 marykelly.rowland@va.gov	No
Bethel/Royalton Transfer Station	122 Waterman Rd South Royalton, VT 05068-5286	Windsor	Brown, Chet 8027632232 solidwaste683@yahoo.com	Yes
Ludlow Transfer Station	336 Route 100 S Ludlow, VT 05149-9510	Windsor	Potter, Patti (802) 228-2846	Yes
Cavendish Recycling Facility	354 Route 131 Cavendish, VT 05142	Windsor	Svec, Richard (802) 226-7743	Yes
Chester-Springfield Recycling Ctr	135 Fairground Rd Springfield, VT 05156-2114	Windsor	Farrar, Dan (802) 885-5827	Yes
Weathersfield Recycling Center	5024 Route 106 Perkinsville, VT 05151	Windsor	Hazeltine, Wes (802) 263-5651	Yes





M. Retrieve Technologies and Battery Solutions Audit Summaries

# RETRIEV

## TECHNOLOGIES

### Audit Information

Retriev Technologies Ltd.  
9384 Highway 22A  
Trail, British Columbia, V1R 4W6





## Table of Contents

TABLE OF CONTENTS.....	2
FACILITY OVERVIEW.....	3
SITE CHARACTERISTICS .....	3
ADJACENT PROPERTIES.....	4
GEOLOGY AND HYDROLOGY: .....	4
SITE SECURITY: .....	4
SITE LOCATION MAP .....	5
SITE MAP .....	6
FACILITY PERMIT .....	7
COMPLIANCE HISTORY.....	8
INSURANCE AND FINANCIAL RESPONSIBILITY .....	8
CERTIFICATE OF INSURANCE .....	9
PROCESS DESCRIPTION.....	10
PRIMARY BATTERIES .....	10
LITHIUM ION BATTERIES .....	10
OPERATIONS DIAGRAMS .....	11
LITHIUM PRIMARY PROCESS .....	11
LITHIUM ION PROCESS .....	12
RECORDKEEPING .....	13
CERTIFICATIONS.....	14



## Facility Overview

Retriev Technologies Ltd. (Retriev) specializes in processing and recycling of lithium battery chemistries; including lithium sulphur dioxide, thionyl chloride, iron disulphide, manganese dioxide and lithium ion batteries, lithium battery components and scrap lithium metals. Additional lithium chemistries may be processed upon submission of technical data and proposed emissions monitoring for review by the British Columbia Ministry of the Environmental (MOE).

Retriev is a wholly owned subsidiary of Retriev Technologies Inc. of Anaheim, California. The controlling shareholders of Retriev Technologies Inc. include:

- Kinsbursky Brothers Inc., a battery recycler based in Anaheim, Ca
- Terry, George and Mike Adams based in Anaheim, CA
- The Alpert & Alpert Group

Retriev is located in Trail, B.C. Canada where it operates a lithium hazardous waste storage and treatment facility. The facility began operation in September of 1993 on 11 acres of industrial zoned property that was previously occupied by a chainsaw fabrication plant and subsequently leased by a building supplies company warehouse. The site currently includes a 32,000 sq. ft. office and production building and 3,830 sq. ft. of separate reinforced concrete battery storage bunkers.

The Retriev facility operates under the authority of the MOE as granted by the following permits: 1

- BC MOE Operational Plan for the storage, treatment, and recycling of lithium hazardous wastes.
- Permit PA-12975 for the discharge of contaminants to the atmosphere.

Permit PS-12978 was issued on June 30, 1994 and amended for operational changes and facility expansion. This permit was subsequently converted to an Operational Plan in 2006 as required by the BC MOE. The permit defines the types and quantities of materials which may be managed, and the handling and storage methods employed. A copy of the plan can be made available for review upon request.

Permit PA-12975 was issued July 6, 1994 and last amended on August 14, 2014. This permit defines the volumes and concentration of constituents discharged to the atmosphere and defines the monitoring program and reporting requirements.

## Site Characteristics

The Retriev facility is located in Columbia Gardens Industrial Park, an area zoned for heavy industry, 12 km south of Trail, B.C. on the east side of Highway 22A in the Columbia River Valley.

<sup>1</sup> MOE permits are perpetual and do not require annual renewal.  
Revision: March 27, 2019



### **Adjacent Properties**

*Alpine Recycling* (household waste recycling), *KC Recycling* (metal and automotive batteries), *XL Quality Industrial Services*, and an *Auto Recycling facility* are located to the north.

The *Trimac* reloading facility is located southwest and across the highway, where the *Teck* smelter in Trail trans-loads various feedstock and products including ore concentrates, lead and zinc for shipment to and from around the world. Further southwest (approximately 0.5 km) is a sulfuric acid shipping facility operated by *West Can*.

There are no immediate adjacent developments to the East or West of the facility.

There are two residences located within a kilometer north of the site. The *Trail Regional Airport* is located 2.5 km north of the facility on highway 22A.

### **Geology and Hydrology:**

The nearest body of water, the Columbia River, is approximately 750 meters west, and 100 meters below the mezzanine of the valley. It flows south into the United States approximately 5 km downstream and is used for potable water, power generation and recreation.

The area surrounding the site is predominantly alluvial gravel with a relatively high permeability. Groundwater flow is westward towards the river. A small creek originates about 1 km above the Retrieval facility on the mezzanine however, surface water penetrates the ground into gravel bed prior to reaching the facility.

The Regional District of Kootenay Boundary supplies water to the industrial park from a well located at the north end of the park. Based on the depth of the well, the water table is estimated to be 300' below the surface, approximately at the surface level of the Columbia River. There are no underground storage tanks on the property. There is no known soil contamination at the site.

### **Site Security:**

The operational portion of the property is surrounded by a chain link fence topped by three strands of barbed wire. The gate is kept closed except during deliveries or outbound shipments. Signs indicating authorized personnel only are posted where clearly visible.

Access to the facility is controlled by card readers, and doors are locked to outside traffic. The facility is secured during non-operational hours by electronic surveillance. Security includes continuously monitored smoke detectors and heat-rise sensors. Security cameras are also installed.





## Site Location Map



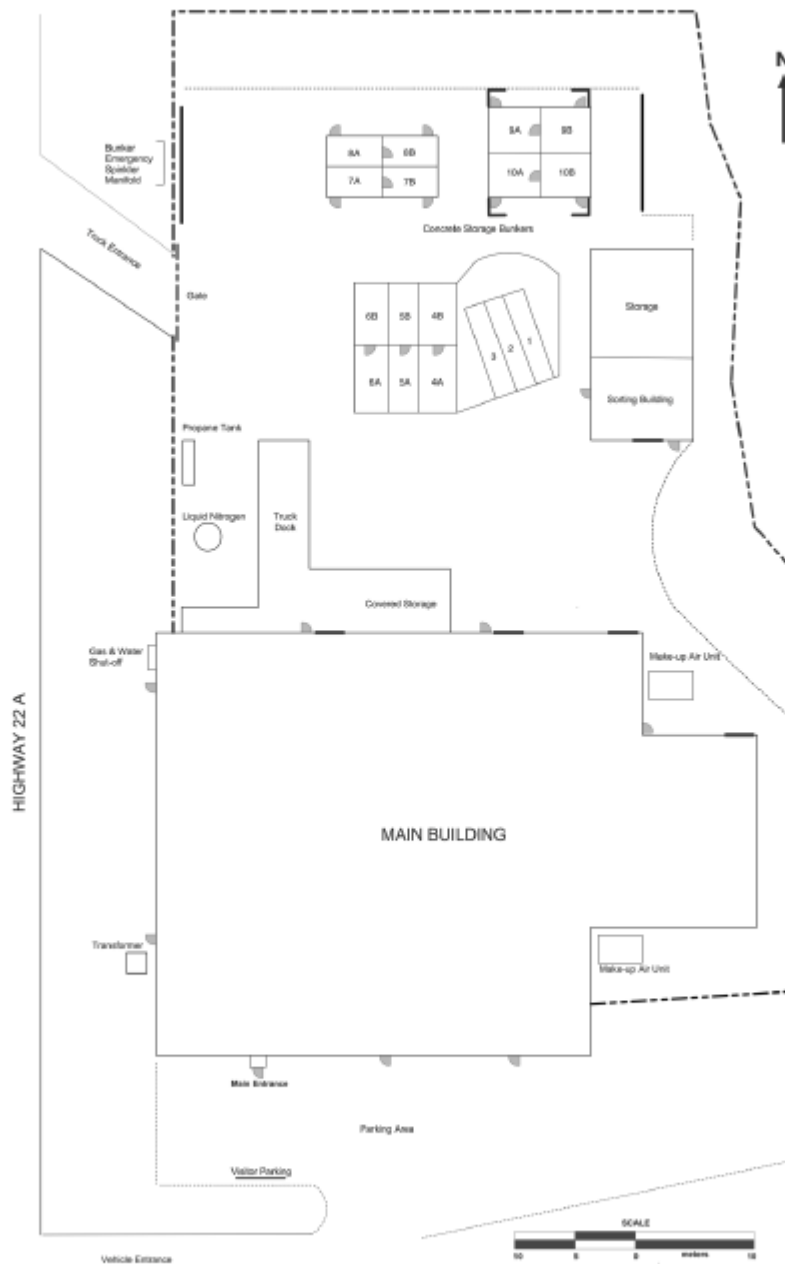
Revision: March 27, 2019

5





## Site Map



Revision: March 27, 2019

6



## Facility Permit

(Cover Page)



BRITISH  
COLUMBIA

MINISTRY OF  
ENVIRONMENT

### PERMIT

12975

*Under the Provisions of the Environmental Management Act*

Toxco Waste Management Ltd.  
DBA  
Retriev Technologies

is authorized to discharge emissions to the air from a Hazardous Waste Storage, Treatment and Recycling Facility located at the Columbia Gardens Industrial Park in Trail, British Columbia, subject to the terms and conditions listed below. Contravention of any of these conditions is a violation of the *Environmental Management Act* and may lead to prosecution.

This Permit supersedes and amends all previous versions of Permit 12975 issued under Part 2, Section 14 of the *Environmental Management Act*.

#### 1. AUTHORIZED DISCHARGES

1.1 This section applies to the continuous discharge of air from a SCRUBBER STACK. The site reference number for this discharge is E298830.

1.1.1 The maximum rate of discharge is 11.8 cubic metres per second, only while the source authorized in Section 1.2 is not operational.

1.1.2 The characteristics of the discharge must be equivalent to or better than:

Total Particulate Matter	30 mg/m <sup>3</sup>
Hydrochloric Acid Mist	15 mg/m <sup>3</sup>
Ammonia	45 ppm

Date issued: July 6, 1994  
Date amended: August 14, 2014  
(most recent)

*Signature*  
Sigit A. Butta, Ph.D., P. Eng.  
Per Director, Environmental Management Act  
Southern Interior Region

Page 1 of 10

Permit Number: 12975

Revision: March 27, 2019

7



### Compliance History

Retriev has not had any violations in the past five years.

### Insurance and Financial Responsibility

Retriev is covered by the following insurance provided through BFL Canada Insurance Services Inc.:

<u>Coverage</u>	<u>Limit</u>
Pollution Liability	\$ 10,000,000.
Commercial Liability	\$10,000,000.
Property Damage	\$ 9,975,030

Retriev is additionally covered by the province-wide Workers' Compensation Insurance. Retriev receives the maximum assessment discount from WCB because of its excellent safety record.

Retriev maintains a \$120,000 Bond to the credit of the Ministry of the Environment to cover all anticipated closure costs. Adjustments to the deposit are made periodically in relation to the level of activity and the quantities of materials stored on site.



## Certificate of Insurance



200, 1167 Kensington Crescent NW Calgary AB T2N 1X7  
T: 403-451-4132 | 1-888-451-4132 | F: 403-313-3385

**CERTIFICATE OF INSURANCE**  
No TOXCWAS-01-19-00004

THIS IS TO CERTIFY TO:

**To Whom it May Concern**

that the following described policy(ies) or cover note(s) in force at this date have been effected to cover as shown below:

**NAMED INSURED:** Retrieiv Technologies Ltd.

**ADDRESS:** 9384 Highway 22A, Trail, BC V1R 4W6

Description of operations and/or activities and/or locations to which this certificate applies:

Evidence of Insurance

TYPE	INSURER / POLICY No	TERM	LIMITS
<b>Commercial General Liability</b>	Chubb Insurance Company of Canada Policy No: CGL36039775	Mar 26, 2019 to Mar 26, 2020	
Including Bodily Injury, Property Damage, Products and Completed Operations			
Bodily Injury and Property Damage			\$ 10,000,000
<b>Premises Pollution Liability</b>	Chubb Insurance Company of Canada Policy No: EIL334551	Mar 26, 2019 to Mar 26, 2020	
Each Claim			\$ 10,000,000
Aggregate			\$ 10,000,000
<b>Property</b>	Northbridge General Insurance Corporation Policy No: CDN8203	Mar 26, 2019 to Mar 26, 2020	
'All Risks' of Direct Physical Loss or Damage (except as excluded)			
Property of Every Description			As on file with Insurer
Business Interruption			

### Additional Information

This certificate is issued as a matter of information only and is subject to all the limitations, exclusions and conditions of the above-listed policies as they now exist or may hereafter be endorsed.

Should one of the above-noted policies be cancelled before the expiry date shown, notice of cancellation will be delivered in accordance with the policy provisions.

Limits shown above may be reduced by Claims or Expenses paid.

**BFL CANADA Insurance Services Inc.**



Authorized Representative  
Adam Bunz

Signed in Calgary this March 26, 2019

BFL CANADA Insurance Services Inc.

bflcanada.ca

Revision: March 27, 2019

9



## Process Description

Materials are received from locations throughout world. The batteries may arrive in a variety of containers (e.g. in drums, crates or palletized boxes). The batteries are inspected, weighed, and sorted once received for storage.

### Primary Batteries

Just prior to processing the packaging is removed and the batteries are weighed and placed into liquid nitrogen. This cools the batteries thus minimizing the reactivity of the batteries during shredding and treatment. Gases or fumes liberated during shredding are controlled in a wet scrubber system and a travelling bed filter. Atmospheric emissions are monitored to ensure compliance. Soluble components of the battery that are dissolved in the solution are precipitated from solution and recovered and processed to produce lithium carbonate. Scrap metal and plastic from the batteries is also recovered from the treatment tank. The scrap is separated into metallic and non-metallic fractions for recycle and/or disposal. A flow diagram for the process is shown below.

### Lithium Ion Batteries

Lithium ion batteries, for example from HEV and EV's, are dismantled to the cell or module level, depending on construction. Various steel, electrical, and plastic components are recycled. Lithium-ion consumer batteries are processed as received after sorting.

Cells are crushed and size-reduced under a process solution. The crushed cells undergo a size separation, separating the material into a metal and plastic fraction, and a slurry. The slurry is filtered to produce a nickel-cobalt filter cake. The metals and plastic fragments go through a sink-float separation, to produce a mixed metal (copper-aluminum mixture) and a plastic fraction.

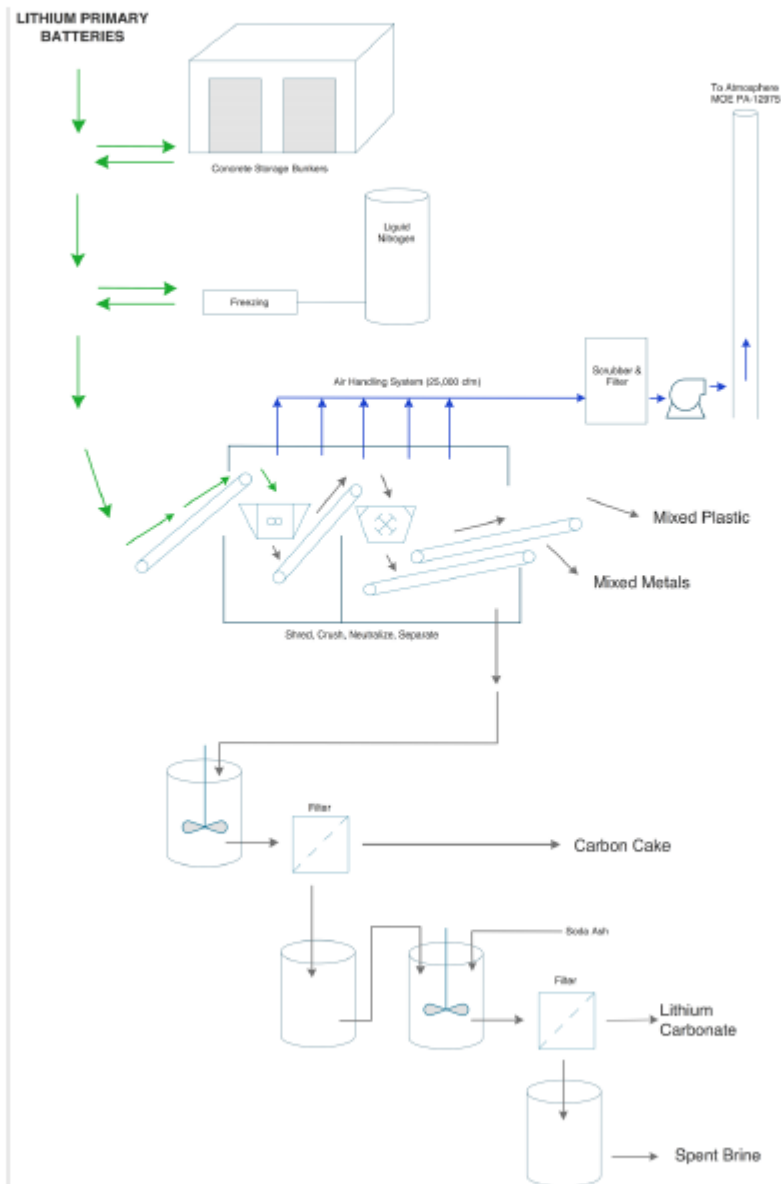
Solution from the filtration step contains the organic portion of the electrolyte and is reused in the crushing process. The organic components are consumed by microbes, which are added to holding tanks within the process.





## Operations Diagrams

### Lithium Primary Process

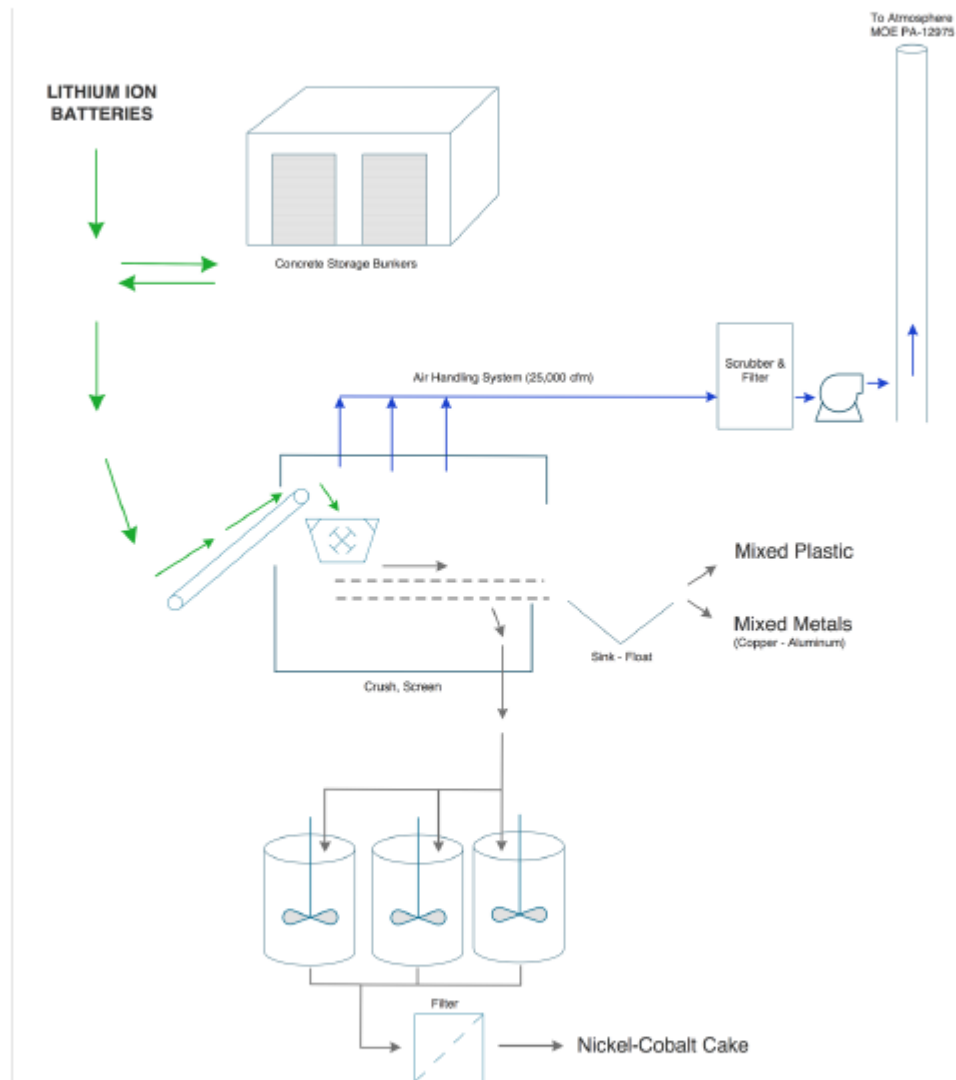


Revision: March 27, 2019

11



### Lithium Ion Process



Revision: March 27, 2019

12



## Recordkeeping

Profiles – all generators are required to complete and submit a Lithium Waste Profile Sheet for approval prior to shipping any materials. This profile typically involves identification of the particular chemistry of the batteries to be shipped. Analytical, dimensional and structural information may be requested following review of the profile. A sample may be required for prescreening. Each profile is assigned an approval number and that profile number is identified on the manifest. A copy of the profile is kept in perpetuity.

Manifest – signed copies of all shipping papers and hazardous waste manifests are maintained on site as required. Retrieval is currently in the process of electronically recording and storing all paperwork relating to shipments on and off-site. Copies are maintained in perpetuity.

Certificate of Acceptance – are issued to each generator upon receipt and acceptance of the lithium wastes at the facility. Copies are maintained in perpetuity.

Certificate of Recycling – are issued upon complete recycling of the material.

Process Records – records of selected process, operating conditions, material receipt, and movement, are maintained to assist in process control and improvement. A report of production volumes and inventory levels is submitted to the MOE. Copies are maintained for a minimum of three years.

Emissions monitoring – is conducted on an annual basis by an independent third party environmental firm as required by the B.C. Ministry of Environment. A copy of this report is submitted to the Ministry. Additional monitoring of emissions is conducted on an as-needed basis when process conditions warrant. Copies are maintained for a minimum of five years.

Regulatory inspections – a weekly environment and safety inspection is made of the facility. The record of this inspection is used to ensure that any deficiencies are corrected. Inspection records are maintained for a minimum of five years.

Maintenance – a checklist identifies weekly, monthly, quarterly, semi-annual and annual maintenance tasks. Records of maintenance activities are maintained. Maintenance required on a daily basis is performed according to written procedures. Maintenance records are kept a minimum of five years.



Personnel Training - Retrieval provides the following training to employees:

- First Aid
- WHMIS (Workplace Hazardous Materials Information System)
- Emergency Contingency Plan
- Personal Protective Equipment
- Process Operations
- Confined Space
- Lock-out / Tag-out
- Propane Gas Handling
- Liquid Nitrogen Safety

### **Certifications**

Retrieval maintains the following certifications:

R2:2013  
ISO 14001: 2015  
OHSAS 18001: 2007

Copies of the certificates are found below.



# PERRY JOHNSON REGISTRARS, INC.

## *Certificate of Registration*

*Perry Johnson Registrars, Inc., has audited  
the Environmental, Health and Safety Management System of:*

***Retriev Technologies Ltd.***  
***9384 Highway 224, Trail, BC V1R 4W6 Canada***

*The organization has been audited by a certification body that is in conformance with ISO/IEC  
17021 requirements and applicable Accreditation Body requirements. The organization is found to be  
in conformance with the R2 Standard as applied by the R2 Code of Practices.*

***Responsible Recycling® (R2) Rev. 7/2013***

*This Registration is in respect to the following scope:*

***Receiving, Sorting and Recycling of Batteries and Portable  
Handheld Electronics containing Lithium Batteries***

*This Registration is granted subject to the system rules governing the Registration referred to above, and the  
Organization hereby covenants with the Assessment body duty to observe and comply with the said rules.*



Responsible™  
Recycling

*Terry Boboige*  
Terry Boboige, President  
Perry Johnson Registrars, Inc. (PIR)  
755 West Big Beaver Road, Suite 1340  
Troy, Michigan 48064  
(248) 358-3388

*The validity of this certificate is dependent upon ongoing surveillance.*

*Effective Date:*  
**February 27, 2019**

*Expiration Date:*  
**February 26, 2022**

*Certificate No.:*  
**C2019-00687**







## PERRY JOHNSON REGISTRARS, INC.

### *Certificate of Registration*

*Perry Johnson Registrars, Inc., has audited  
the Environmental Management System of:*

***Retriev Technologies Ltd.***  
***9384 Highway 22A, Trail, BC V1R 4W6 Canada***

*(Hereinafter called the Organization) and hereby declares that  
Organization is in conformance with:*

***ISO 14001:2015***

*This Registration is in respect to the following scope:*

***Receiving, Sorting and Recycling of Batteries and Portable  
Handheld Electronics containing Lithium Batteries***

*This Registration is granted subject to the system rules governing the Registration referred to above, and the  
Organization hereby covenants with the Assessment body duty to observe and comply with the said rules.*



**PERRY JOHNSON  
REGISTRARS, INC.**



**UKAS  
MANAGEMENT  
SYSTEMS**



**ANAB  
ACCREDITED**



**Terry Boboige, President**  
Perry Johnson Registrars, Inc. (PIR)  
755 West Big Beaver Road, Suite 1340  
Troy, Michigan 48064  
(248) 358-3388

*The use of the UKAS accreditation symbol is in respect to the activities covered by the Accreditation Certificate Number 0105.*

*The validity of this certificate is dependent upon ongoing surveillance.*

*Expiry Date:*  
**February 27, 2019**

*Expiry Date:*  
**February 26, 2022**

*Certificate No.:*  
**C2019-00685**





## PERRY JOHNSON REGISTRARS, INC.

### *Certificate of Registration*

*Perry Johnson Registrars, Inc., has audited  
the Occupational Health and Safety Management System of:*

***Retriev Technologies Ltd.***  
***9384 Highway 224, Trail, BC V1R 4W6 Canada***

*(Hereinafter called the Organization) and hereby declares that  
Organization is in conformance with:*

***OHSAS 18001:2007***

*This Registration is in respect to the following scope:*

***Receiving, Sorting and Recycling of Batteries and Portable  
Handheld Electronics containing Lithium Batteries***

*This Registration is granted subject to the system rules governing the Registration referred to above, and the  
Organization hereby covenants with the Assessment body duty to observe and comply with the said rules.*






Terry Boboige, President  
Perry Johnson Registrars, Inc. (PJR)  
755 West Big Beaver Road, Suite 1340  
Troy, Michigan 48064  
(248) 358-3388

*The use of the UKAS accreditation symbol is in respect to the activities covered by the Accreditation Certificate Number 0105.*

*The validity of this certificate is dependent upon ongoing surveillance.*

*Effective Date:*  
**February 27, 2019**

*Expiration Date:*  
**March 11, 2021**

*Certificate No.:*  
**C2019-00686**



## N. Shipping batteries instructions

Recharging the planet. Recycling your batteries.

call2recycle®

### How to Safely Pack and Ship Batteries using the Call2Recycle Program





Recharging the planet. Recycling your batteries.™



## How to Safely Pack and Ship Batteries using the Call2Recycle Program

While batteries are common in everyday portable electronic, tools and other devices, they can be dangerous if not properly packaged for storage and shipping. For this reason, Call2Recycle requires strict adherence to its handling and shipping requirements. Batteries are subject to US storage and shipping regulations and the shipper of those batteries bears the risk of fines and/or penalties if all shipping requirements are not followed.

This guide is intended to provide background information as well as instructions on how to properly package and ship eligible batteries within the Call2Recycle Box or Call2Recycle Bulk program.

The Call2Recycle program approach to collection is designed with user convenience, safety and flexibility in mind. Call2Recycle provides the necessary collection containers and collateral materials, and pays all shipping, sorting and recycling costs. Provided shipping containers, documents and guidelines incorporate EPA Universal Waste and DOT shipping requirements into the shipping documents, containers and labeling. Call2Recycle's existing DOT special permit has incorporated the DOT requirement for both rechargeable and primary batteries.

### Call2Recycle General Terms / Definitions

- **BOL- Bill of Lading:** A shipping document used for shipping materials, this is used for the majority of our bulk shipments.
- **Manifest:** A shipping document required to ship a regulated hazardous waste required by EPA. A more rigorous document with transport, training and control number requirements.
- **US Department of Transportation (DOT):** Regulates hazardous materials (HM) in transport, if a UN number like UN3480 is used, it means it is a regulated HM and shipped on a BOL with additional requirements. The DOT issued the Call2Recycle program box special permit as well as the special provisions for exemptions (Li under 66 pound containers).
- **Eligible Batteries:** Dry Cell Rechargeable batteries 11 pounds and under including NiMH, NiCd, NiZn, Li-Ion, SSLA. Dry Cell single use batteries including Alkaline, Carbon Zinc, Silver Oxide and Lithium Primary.
- **US Environmental Protection Agency (EPA):** Regulates Hazardous Waste (HW), including universal waste. HW shipping requires a manifest. In the US the Call2Recycle exemption from manifesting requirements is the utilization and application of Universal Waste regulations.
- **HM:** Hazardous Material; a DOT term.
- **Lithium Ion:** Rechargeable batteries and include sub-types such as Lithium Polymer

While this document is designed to highlight safety practices for Call2Recycle's customers who pack and ship batteries, it does not replace the applicable regulations. For more information, consult the U.S. DOT's Hazardous Materials Regulations (49 CFR). You may also consult U.S. DOT's online information at <http://hazmat.dot.gov>, or call the U.S. DOT's Hazardous Materials Information Center at 1-800-467-4922.





## Batteries Accepted in the Call2Recycle Program

- Consumer batteries each weighing 11 pounds or less
- Cell Phones (and their batteries) regardless of size, make, model or age, but not their accessories.

Nickel Cadmium	Nickel Metal-Hydride (Ni-MH)
	
Lithium Ion (Li-Ion)	Nickel Zinc (Ni-Zn)
	
Small Sealed Lead Acid (SSLA/Pb)	Cellphones
	
Lithium Primary	Alkaline (AA, AAA, 9V etc.)
	
Silver Oxide	Carbon Zinc (AA, AAA, C etc.)
	

## Batteries NOT accepted: Wet-cell or batteries over 11 pounds

While this document is designed to highlight safety practices for Call2Recycle's customers who pack and ship batteries, it does not replace the applicable regulations. For more information, consult the U.S. DOT's Hazardous Materials Regulations (49 CFR). You may also consult U.S. DOT's online information at <http://hazmat.dot.gov>, or call the U.S. DOT's Hazardous Materials Information Center at 1-800-467-4922.





## Call2Recycle Program Options

### Call2Recycle Box Program

For retailers, businesses and other facilities that collect small quantities of batteries at a time, either internally or from consumers, Call2Recycle offers a collection box kit that includes:

- Plastic bags to hold individual batteries
- Pre-paid and pre-addressed UPS or FedEx shipping label
- Guidelines Sheet with safety instructions
- Poster to promote your recycling efforts



### Call2Recycle Bulk Program

The Call2Recycle program offers a bulk shipping option for shipments of 500 pounds or larger. This option allows much more flexibility for facilities that are collecting batteries in larger quantities.



Call2Recycle has developed an on-line BOL Wizard/Shipping Wizard to assist in correctly completing required shipping documents, labeling and scheduling a shipment. The wizard is designed to take advantage of specific exemptions as well as incorporate proper shipping language required for participants in the Call2Recycle program by the US Department of Transportation. Pick-ups can also be scheduled by using the wizard.

## Preparing Batteries for Shipment

### Protect Batteries and Terminals

When shipping almost any battery, you must protect all terminals against short circuits that can result in fires. Protect terminals by completely covering them with an insulating, non-conductive material (e.g., enclosing each battery separately in a plastic bag, or using clear packing tape over both terminals). Package the batteries to keep them from being crushed or damaged, and to keep them from shifting during handling. Always keep metal objects or other materials that can short circuit battery terminals away from the batteries.

While this document is designed to highlight safety practices for Call2Recycle's customers who pack and ship batteries, it does not replace the applicable regulations. For more information, consult the U.S. DOT's Hazardous Materials Regulations (49 CFR). You may also consult U.S. DOT's online information at <http://hazmat.dot.gov>, or call the U.S. DOT's Hazardous Materials Information Center at 1-800-467-4922.



## Preparing Batteries for Shipment

### Using Call2Recycle Boxes

The Call2Recycle DOT Special Permit allows co-mingling of all rechargeable and primary batteries that are accepted in the Call2Recycle program. The permit requires that lithium primary and rechargeable batteries have terminal protection, while alkaline batteries, up to 12 volts do not require terminal protection.

Boxes are shipped with bags and instructions on utilizing one bag per battery.

#### Call2Recycle Boxes Include Bags to Ensure Terminal Protection for all Batteries

Insert one battery or cell-phone in provided bags. For big batteries, or if no bag is available, cover terminals with tape.	Remove plastic strip from top of bag to seal.	Deposit sealed bag into the box.  Note: Add accumulation start date on the back of the box when you collect your first battery.

### Using the Bulk Shipping Option

#### Mixed Battery Chemistries in the Same Container

Batteries accepted by Call2Recycle may still be mixed as long as all terminals are protected. However if lithium based or SSLA batteries are included in the container there are special shipping requirements that must be followed. Please review the section *How to ship batteries* for more information.

#### Single Battery Chemistries in a Container

If sorting or separating batteries by chemistry prior to packaging, not all will need terminal protection. The below chart specifies which chemistries require terminal protection when shipping a single chemistry container.

While this document is designed to highlight safety practices for Call2Recycle's customers who pack and ship batteries, it does not replace the applicable regulations. For more information, consult the U.S. DOT's Hazardous Materials Regulations (49 CFR). You may also consult U.S. DOT's online information at <http://hazmat.dot.gov>, or call the U.S. DOT's Hazardous Materials Information Center at 1-800-467-4922.



## Shipping Your Batteries

Battery Chemistry	Terminal Protection Required if Shipped as a Single Chemistry
Alkaline & Carbon Zinc (9 volts & under)	No
Alkaline & Carbon Zinc (over 9 volts)	Yes
Silver Oxide (9 volts & under)	No
Silver Oxide (over 9 volts)	Yes
Lithium Ion or Lithium Primary	Yes
Ni-Cd & Ni-MH (9 volts & under)	No
Ni-Cd & Ni-MH (over 9 volts)	Yes
SSLA or non-spillable Pb	Yes

### Call2Recycle Boxes

Once full (up to 66 pounds) Call2Recycle boxes are returned via UPS or FedEx using prepaid labels that are already on the box when received.

There is a DOT Call2Recycle Special Permit that is specific to the collection boxes used in our program. This permit provides relief from specific Hazardous Materials Regulations. The regulations exempted as a part of this Special Permit include 49 CFR Part 172 subparts C, D and E. This means that when shipping eligible program batteries, alternative requirements for shipping papers, marking and labeling are already on the box and being used.

### Prepare Box for Shipping

Secure the box by cross-taping both vertically and horizontally. Check that your return address is correct on the pre-paid, pre-addressed shipping label. Add box to daily FedEx or UPS pick-up.

Note: UPS may charge a fee for scheduling pick-ups, so to avoid these charges, we recommend that you hold containers until a UPS delivery is made to your location and simply pass the box off to the driver.



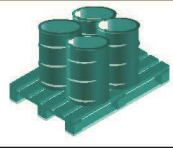




While this document is designed to highlight safety practices for Call2Recycle's customers who pack and ship batteries, it does not replace the applicable regulations. For more information, consult the U.S. DOT's Hazardous Materials Regulations (49 CFR). You may also consult U.S. DOT's online information at <http://hazmat.dot.gov>, or call the U.S. DOT's Hazardous Materials Information Center at 1-800-467-4922.





## Bulk Shipments

Prepare Bulk Shipment		
		
Ensure that you are shipping only dry-cell Alkaline, Carbon zinc, Ni-Cd, Ni-Zn, SSLA/Pb, Ni-MH, Li or Li-Ion or SSLA/Pb batteries weighing 11lbs. each or less.	Verify that batteries are packaged to meet USDOT requirements. They are individually bagged or have taped terminals or meet USDOT short-circuit protection requirements.	It is required that your bulk shipment containers be placed and secured to pallet(s).
	<p><b>Containers containing Li-Ion:</b></p> <p>Under 66lbs ➡ Li-Ion warning label</p> <p>Over 66lbs ➡ Class 9 hazardous materials label</p> <p><b>Containers containing SSLA/Pb:</b></p> <p>➡ Non-spillable Label</p>	
Your shipment will need a Bill of Lading (BOL). Create one easily with our BOL Wizard using your Call2Recycle site ID & 5-digit zip code. If you need your Call2Recycle site ID, please call 877-723-1297.	Shipping labels will be provided when using the BOL Wizard. Follow the labeling instructions provided which will be based on chemistry and containers being shipped. Label and mark the pallet accordingly. Attach one copy of the BOL on each pallet.	Schedule your pick-up through the online BOL Wizard or call our freight partner, UPS, to arrange pick-up. 800-333-7400

### Special Instructions: Lithium based batteries

- Containers with Lithium Primary or Lithium Ion batteries with a gross weight of more than 66 lbs. must be shipped as fully-regulated Class 9 hazardous material on a BOL
- The hazardous material BOL must have HM box checked and shipping description 11 "UN 3480, Lithium Ion batteries, 9, PG II". Li-Ion including Lithium Ion polymer batteries for recycling or UN 3090, Lithium Metal batteries, 9, PG II. Primary Lithium including Lithium alloy batteries for recycling
- The hazardous material containers must carry the Class 9 Miscellaneous hazard label
- Individual shipments must be in poly lined steel drums
- Shippers must be trained in accordance with USDOT hazardous material regulations and provide the class 9 drum label.

While this document is designed to highlight safety practices for Call2Recycle's customers who pack and ship batteries, it does not replace the applicable regulations. For more information, consult the U.S. DOT's Hazardous Materials Regulations (49 CFR). You may also consult U.S. DOT's online information at <http://hazmat.dot.gov>, or call the U.S. DOT's Hazardous Materials Information Center at 1-800-467-4922.



## After the Shipment

Regardless of how your batteries are shipped, once they are received at one of our sorting/recycling facilities they are sorted by chemistry, weighed and recorded to your account in our database. During this process, any safety and/or compliance concerns are noted.

A Call2Recycle representative may contact the shipper of record to advise them of the issue found. Should Call2Recycle find the same compliance issue multiple times and the proper precautions have not been taken, the account may be suspended until it's determined that the appropriate training and procedure documentation has taken place.

Below are the most common concerns found in battery shipments that are part of the Call2Recycle program:

No Terminal Protection	Loose Metal or Other Sharp	Packaging is Not Secure
Contains Wet Cell Batteries that are NOT Included in our Program	Contains Leaking Batteries	Batteries or Container Shows Burn Marks

While this document is designed to highlight safety practices for Call2Recycle's customers who pack and ship batteries, it does not replace the applicable regulations. For more information, consult the U.S. DOT's Hazardous Materials Regulations (49 CFR). You may also consult U.S. DOT's online information at <http://www.hazmat.dot.gov>, or call the U.S. DOT's Hazardous Materials Information Center at 1-800-467-4822.





## Box Anomaly Report - SAMPLE ONLY

### Vermont Collector

Reporting From: 3/1/2015 To: 3/31/2015

Total Receipts: 1,248

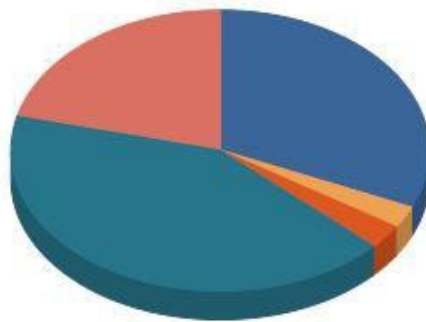
Total Exceptions: 38

3.04% of Total Receipts

Sites with Exceptions: 36

Total Sites: 140

#### Exceptions Breakdown



Unprotected Terminals	31.6%
Contains Loose Metal / Sharps	2.6%
Box Damaged or Not Closed	0.0%
Contains Wet Cell Batteries	2.6%
Contains Leaking Batteries	0.0%
Batteries or Box Show Burn Marks	0.0%
Receipt Over 66 lbs With Lithium	42.1%
Receipt Over 66 lbs No Lithium	21.1%
Total	100.0%

Interactive Map



Vermont	Description
0	Contains Wet Cell Batteries
0	Unprotected Terminals
0	Contains Loose Metal/Sharps
0	Box Damaged or Not Closed
0	Total Exceptions
0	Contains Leaking Batteries
0	Batteries or Box Show Burn Marks
0	Receipt Over 66 lbs With Lithium
0	Receipt Over 66 lbs No Lithium



## O. Sample non-compliance report

<b>Account Name</b> Location: City, State Store / Site Number: XXXXX Unprotected Terminals: 1 Contains Loose Metal / Sharps: 0 Box Damaged / Not Closed: 0	<b>Exceptions:1</b>  Contains Wet Cell Batteries: 0 Contains Leaking Batteries: 0 Batteries of Box Show Burn Marks: 0	Call2Recycle ID: XXXXX  Receipt Over 66 lbs With Lithium: 0 Receipt Over 66 lbs No Lithium: 0
<b>Account Name</b> Location: City, State Store / Site Number: XXXXX Unprotected Terminals: 1 Contains Loose Metal / Sharps: 1 Box Damaged / Not Closed: 0	<b>Exceptions:2</b>  Contains Wet Cell Batteries: 0 Contains Leaking Batteries: 0 Batteries of Box Show Burn Marks: 0	Call2Recycle ID: XXXXX  Receipt Over 66 lbs With Lithium: 0 Receipt Over 66 lbs No Lithium: 0
<b>Account Name</b> Location: City, State Store / Site Number: XXXXX Unprotected Terminals: 1 Contains Loose Metal / Sharps: 0 Box Damaged / Not Closed: 0	<b>Exoceptions:1</b>  Contains Wet Cell Batteries: 0 Contains Leaking Batteries: 0 Batteries of Box Show Burn Marks: 0	Call2Recycle ID: XXXXX  Receipt Over 66 lbs With Lithium: 0 Receipt Over 66 lbs No Lithium: 0
<b>Account Name</b> Location: City, State Store / Site Number: XXXXX Unprotected Terminals: 0 Contains Loose Metal / Sharps: 0 Box Damaged / Not Closed: 0	<b>Exceptions: 1</b>  Contains Wet Cell Batteries: 0 Contains Leaking Batteries: 0 Batteries of Box Show Burn Marks: 0	Call2Recycle ID: XXXXX  Receipt Over 66 lbs With Lithium: 1 Receipt Over 66 lbs No Lithium: 0
<b>Account Name</b> Location: City, State Store / Site Number: XXXXX Unprotected Terminals: 1 Contains Loose Metal / Sharps: 0 Box Damaged / Not Closed: 0	<b>Exceptions:1</b>  Contains Wet Cell Batteries: 0 Contains Leaking Batteries: 0 Batteries of Box Show Burn Marks: 0	Call2Recycle ID: XXXXX  Receipt Over 66 lbs With Lithium: 0 Receipt Over 66 lbs No Lithium: 0
<b>Account Name</b> Location: City, State Store / Site Number: XXXXX Unprotected Terminals: 1 Contains Loose Metal / Sharps: 0 Box Damaged / Not Closed: 0	<b>Exceptions:1</b>  Contains Wet Cell Batteries: 0 Contains Leaking Batteries: 0 Batteries of Box Show Burn Marks: 0	Call2Recycle ID: XXXXX  Receipt Over 66 lbs With Lithium: 0 Receipt Over 66 lbs No Lithium: 0
<b>Account Name</b> Location: City, State Store / Site Number: XXXXX Unprotected Terminals: 0 Contains Loose Metal / Sharps: 0 Box Damaged / Not Closed: 0	<b>Exceptions:1</b>  Contains Wet Cell Batteries: 0 Contains Leaking Batteries: 0 Batteries of Box Show Burn Marks: 0	Call2Recycle ID: XXXXX  Receipt Over 66 lbs With Lithium: 0 Receipt Over 66 lbs No Lithium: 1
<b>Account Name</b> Location City, State Store / Site Number: XXXXX Unprotected Terminals: 0 Contains Loose Metal / Sharps: 0 Box Damaged / Not Closed: 0	<b>Exceptions:1</b>  Contains Wet Cell Batteries: 0 Contains Leaking Batteries: 0 Batteries of Box Show Burn Marks: 0	Call2Recycle ID: XXXXX  Receipt Over 66 lbs With Lithium: 1 Receipt Over 66 lbs No Lithium: 0



## P. BOL Wizard instructions (excerpt)

Recharging the planet. Recycling your batteries.™



### SHIPPING YOUR BATTERIES IS SAFE, EASY AND FREE!

#### Shipping: Using the Online Wizard to Create a Bill of Lading (U.S. Version)

Call2Recycle® offers a step-by-step online wizard that simplifies the bill of lading (BOL) process for shipping your batteries. The following outlines the steps used in the wizard and what information you will need in order to complete the online process. If you have any questions, please contact our Customer Service Team at 877-723-1297.

##### Before You Begin:

- Make sure all batteries have been discharged
- Batteries have been properly bagged and placed in lined drums or other containers
- Drums/containers are sealed and ready to be shipped

Visit <http://www.call2recycle.org/bill-of-lading> to start the wizard, you will first see this screen:

#### PLEASE READ BEFORE YOU PROCEED.

Call2Recycle offers a Bill of Lading (BOL) Wizard to help you create a BOL in a few easy steps.

**You must have a minimum of 500 lbs. of batteries in total weight to ship in bulk.**

Pallet weight not to exceed 2,500 lbs.

Questions? If you are in the US, contact our Customer Service Team at 877.723.1297. For bulk shipping in Canada, [click here](#).

Not a participating collection site? [Request information](#) about the program.

#### YOU WILL NEED THE FOLLOWING INFORMATION TO COMPLETE THE BOL:

- ☐ Account information (site ID # and account's 5-digit zip code)
- ☐ Email address (optional)
- ☐ Number of pallets
- ☐ Total weight of each battery chemistry
- ☐ Type of container for each chemistry
- ☐ Number of each container type

*Note: Government shipping standards require that all batteries being shipped must be either individually bagged or have taped terminals or meet U.S. DOT short-circuit protection requirements or exemptions. For drum shipments, poly-lined steel drums are preferred. They are required for shipping Li-Ion batteries weighing more than 66 pounds. Li-Ion battery shipments must also meet DOT hazardous material shipping regulations. Visit the U.S. DOT website for more information.*

Next >>



Recharging the planet. Recycling your batteries.™



## SHIPPING YOUR BATTERIES IS SAFE, EASY AND FREE!

**Step 5:** When scheduling the pickup with UPS Freight online, contact information, including email address, is required. Any contact details that you provided in Step 2 will automatically be pre-populated for you. You can also provide any special instructions for UPS. You will receive a separate confirmation email from UPS Freight for the scheduled pickup.

### STEP 5: SCHEDULE A PICKUP (OPTIONAL)

You can schedule an OPTIONAL pickup date and time now. Provide a Date and the range of times your contact will be available for pickup. All times are local times for your locations.



*If your shipment will not be ready at the time you scheduled, please contact our preferred freight carrier at 800-333-7400, otherwise charges may be incurred.*

Pickup Date:	<input type="text" value="08/14/2014"/>
Earliest Pickup Time:	<input type="text" value="9:30am"/>
Latest Pickup Time:	<input type="text" value="11:30am"/>

Provide your Pickup Contact Information

Your Contact Name, Phone Number and Email are required in order to schedule a pickup.

Pickup Contact Name:	<input type="text" value="Ima Recycler"/>
Pickup Contact Phone:	<input type="text" value="9135550987"/>
Pickup Contact Email:	<input type="text" value="ima@testsite.com"/>

Provide your Pickup Contact Information

Special Instructions:	<input type="text" value="Come to rear of building"/>
Remaining Characters: 46	

<< Previous

Next >>





Recharging the planet. Recycling your batteries.™



## SHIPPING YOUR BATTERIES IS SAFE, EASY AND FREE!

**Step 6:** You can now download all of the documentation you will need for final preparation of your shipment. You can download a copy of the BOL as well as shipping instructions that includes the required shipping label.

### CONGRATULATIONS! YOUR PDFS ARE READY TO PRINT

Please remove all old labels from containers, unless they are still applicable to the contents being shipped.

Please affix a copy of the shipping label to each container and update the label accordingly.

*If your shipment will not be ready at the time you scheduled, please contact our preferred freight carrier at 800-333-7400 otherwise charges may be incurred.*

IMPORTANT: Please print enough copies of your Bill of Lading to affix one to the side of each pallet, one for your records and one for the driver.

Download &  
Print BOL



Download  
Shipping Label



Note: All shipments are shipped standard LTL and not expedited or guaranteed.

We do not save any of the information that you provide during this process and it will be reset once you download your PDF. Restarting the process will result in a brand new bill of lading for additional shipments.

If you included your email address, a copy of the bill of lading will be sent to you via email.

Questions? Please contact our [Customer Service Team](#) (877.723.1297).

Thank you!

<< Previous

Thank you for preserving the environment by recycling your batteries through the Call2Recycle® program. If you have any questions, please contact our Customer Service Team at 877-723-1297.





Q. Sample marketing materials

Window Cling

# Recycle your batteries here

## Make a positive impact in your community.

Look for the collection box inside. ►

call2recycle®

Rack card

# Recycle your batteries here

Single-use and rechargeable batteries

Make a positive impact in your community.

[www.call2recycle.org](http://www.call2recycle.org)

call2recycle®



## Municipal Flyer



## Battery Recycling Program

Good for you. Good for the environment.

### Chittenden County recycles batteries\*

Recycle your batteries at a location listed below:

**NW VT Solid Waste**  
158 Morse Rd  
FAIRFAX VT 05454  
802-524-5986

**Best Buy**  
26 Cypress St  
WILLISTON, VT 05495  
802-872-0992

**Kinney Drugs**  
10212 Route 116  
HINESBURG, VT 13642  
802-482-4886

**Russell Supply**  
9 Gregory Dr South  
BURLINGTON, VT 05403  
802-863-1177

**Home Depot**  
759 Harvest Ln  
WILLISTON, VT 05495  
802-872-0039

**Verizon Wireless**  
825 Williston Rd South  
BURLINGTON, VT 05403  
802-865-3100

**Kinney Drugs**  
800 Us Rt. 302  
BERLIN BARRE, VT 05641  
802-476-6659

**Milton Ace Hardware**  
380 Route 7 S  
MILTON, VT 05468  
802-893-4100

**Milton Drop-Off Center**  
36 Landfill Rd  
MILTON, VT 05468  
802-893-6551

**Burlington Drop-Off Center**  
339 Pine St  
BURLINGTON, VT 05401  
802-863-3827

**Essex Equipment**  
26 Kellogg Rd Essex  
JUNCTION, VT 05452  
802-879-0767

**Sears**  
155 Dorset St S  
BURLINGTON, VT 05403  
802-859-2011

For a complete list of batteries that we accept, please visit us at [www.call2recycle.org/program-info](http://www.call2recycle.org/program-info).  
Find more recycling locations at [www.call2recycle.org/locator](http://www.call2recycle.org/locator).

\*Batteries weighing 11 lbs. or less

[call2recycle.org](http://call2recycle.org)

© 2015 Call2Recycle® All rights reserved.



## R. Status report of battery brands from audit not on program

Brand	Status	Brand	Status	Brand	Status
Family Dollar	Engaged	e3nergy	Overseas Producer	Yonli	Unknown
Yards Beyond	Engaged	Everful	Overseas Producer	E Circuit	Unknown
Everlast	Engaged	Fred Meyer	Private label not sold in VT	EB top	Unknown
Golden Ultra	Engaged	Safeway	Private label not sold in VT	Farer	Unknown
Infinity Gold	Engaged	Frys	Private label not sold in VT	Gritty	Unknown
Magic Power	Engaged	Sav On	Private label not sold in VT	Hi Power	Unknown
Pro Cell	Engaged	Wegmans	Private label not sold in VT	Ignite	Unknown
Dollar General	Engaged	Lextron	Private label not sold in VT	Kick N Power	Unknown
Doc Johnson	Engaged	Thunderbolt	Private label not sold in VT	Lamina	Unknown
Zontex	Engaged	Smart Living	Private label not sold in VT	Laser	Unknown
Dureday	Engaged	Members Mark	Private label not sold in VT	Longs	Unknown
EMAX	Engaged	Northtec	Private label not sold in VT	Magic Cell	Unknown
Expocell	Engaged	Chicago Electric	Private label not sold in VT	Mallory	Unknown
Fidak	Engaged	Kroger	Private label not sold in VT	Marquee	Unknown
HW Max	Engaged	Winners	Private label not sold in VT	Megaton	Unknown
Pakko	Engaged	Medcell	Sold in Products Only	National	Unknown
Power Max	Engaged	Citipower	Sold in Products Only	New Bright	Unknown
DG	Engaged	Werner	Sold in Products Only	New Star	Unknown
Dynex	Engaged	EBF	Sold in Products Only	Sunpadow	Unknown
Albertsons	Engaged	EZ Tec	Sold in Products Only	Newffa	Unknown
Hitachi	Overseas Producer	Gigamax	Sold in Products Only	Platinum	Unknown
PKCell	Overseas Producer	New Brite	Sold in Products Only	Power Xn	Unknown
D&G	Overseas Producer	Phaser	Sold in Products Only	Power+	Unknown
Dishy	Overseas Producer	QuickDeer	Sold in Products Only	PowRfuel	Unknown
DMEGC	Overseas Producer	Tru Cook	Sold in Products Only	ProStart	Unknown
Xuan Li	Overseas Producer	USA Mobility	Sold in Products Only	Shenkang	Unknown
Hong Feng	Overseas Producer	Usance	Sold in Products Only	Sunny Select	Unknown
Huan Yu	Overseas Producer	IGIA	Sold in Products Only	Sunpower	Unknown
Huxing	Overseas Producer	Player	Unknown	Thomson	Unknown
Legion	Overseas Producer	Electrocell	Unknown	Tianbar	Unknown
Peony	Overseas Producer	BD	Unknown	tO	Unknown
Gettop	Overseas Producer	Widimax	Unknown	Toceba	Unknown
Raymax	Overseas Producer	Xi	Unknown	US Electronics	Unknown
Asia	Overseas Producer				



## S. Excerpt from the EU battery directive

2006L0066 — EN — 05.12.2008 — 002.001 — 11

▼B

### Article 9

#### Economic instruments

Member States may use economic instruments to promote the collection of waste batteries and accumulators or to promote the use of batteries and accumulators containing less polluting substances, for instance by adopting differential tax rates. If they do so, they shall notify the measures related to the implementation of those instruments to the Commission.

### Article 10

#### Collection targets

1. Member States shall calculate the collection rate for the first time in respect of the fifth full calendar year following the entry into force of this Directive.

Without prejudice to Directive 2002/96/EC, annual collection and sales figures shall include batteries and accumulators incorporated into appliances.

2. Member States shall achieve the following minimum collection rates:

(a) 25 % by 26 September 2012;

(b) 45 % by 26 September 2016.

3. Member States shall monitor collection rates on a yearly basis according to the scheme set out in Annex I. Without prejudice to Regulation (EC) No 2150/2002 of the European Parliament and of the Council of 25 November 2002 on waste statistics <sup>(1)</sup>, Member States shall transmit reports to the Commission within six months of the end of the calendar year concerned. Reports shall indicate how they obtained the data necessary to calculate the collection rate.

▼M1

4. Transitional arrangements may be laid down in accordance with the regulatory procedure referred to in Article 24(2) to address difficulties faced by a Member State in satisfying the requirements of paragraph 2 as a result of specific national circumstances.

A common methodology shall be established for the calculation of annual sales of portable batteries and accumulators to end-users by 26 September 2007. That measure, designed to amend non-essential elements of this Directive by supplementing it, shall be adopted in accordance with the regulatory procedure with scrutiny referred to in Article 24(3).

▼B

### Article 11

#### Removal of waste batteries and accumulators

Member States shall ensure that manufacturers design appliances in such a way that waste batteries and accumulators can be readily removed. Appliances into which batteries and accumulators are incorporated shall be accompanied by instructions showing how they can be removed safely and, where appropriate, informing the end-user of the type of the incorporated batteries and accumulators. These provisions shall not apply where, for safety, performance, medical or data integrity reasons, continuity of power supply is necessary and requires a

<sup>(1)</sup> OJ L 332, 9.12.2002, p. 1. Regulation as last amended by Commission Regulation (EC) No 783/2005 (OJ L 131, 25.5.2005, p. 38).





## T. Call2Recycle's R2 Certification



# CERTIFICATE OF REGISTRATION

This is to certify that  
**Call2Recycle, Inc.**

1000 Parkwood Circle SE Suite 200 Atlanta, Georgia 30339 USA

Refer to Attachment to Certificate of Registration dated July 2, 2019 for additional certified sites  
operates a

**Environmental, Health and Safety Management System**  
which complies with the requirements of

**RESPONSIBLE RECYCLING®:2013**

for the following scope of certification

**Management of the Collection, and the Distribution to Downstream Processors, for the  
Recycling of Batteries and Cell Phones. The Toronto office is dependent upon the Atlanta  
head office for shared services including IT and operations support.**

Certificate No.: CERT-0130281 File No.: 1698563 Issue Date: July 2, 2019	Original Certification Date: August 7, 2018 Certification Effective Date: August 7, 2018 Certification Expiry Date: December 21, 2020
--	---



Heather Mahon  
Global Head of Technical Services  
SAI Global Assurance



**RESPONSIBLE  
RECYCLING®:2013**



**SAI GLOBAL**  
INFORM. INSPIRE. IMPROVE.

Registered by:  
OMI-SAI Canada Limited (SAI Global), 20 Carlson Court, Suite 200, Toronto, Ontario M9W 7Y8 Canada. This registration is subject to the SAI Global  
Terms and Conditions for Certification. While all due care and skill was exercised in carrying out this assessment, SAI Global accepts responsibility only for  
proven negligence. This certificate remains the property of SAI Global and must be returned to them upon request.  
To verify that this certificate is current, please refer to the SAI Global On-Line Certification Register: [www.sai-global.com/verify-companies/](http://www.sai-global.com/verify-companies/)





## ATTACHMENT TO CERTIFICATE OF REGISTRATION

These sites are registered under Certificate No: CERT-0130281 issued on July 2, 2019

File No.		Effective Date
1698563	<b>Call2Recycle, Inc.</b> 1000 Parkwood Circle SE Suite 200 Atlanta , Georgia 30339 USA Management of the Collection, and the Distribution to Downstream Processors, for the Recycling of Batteries and Cell Phones.	August 7, 2018
1698581	<b>Call2Recycle Canada, Inc</b> 5140 Yonge Street Suite 1570 Toronto , Ontario M2N 6L7 Canada Management of the Collection and the Distribution to Downstream Processors for the Recycling of Batteries.	August 7, 2018

These registrations are dependent on Call2Recycle, Inc. (File No. 1698563) maintaining their scope of registration to RESPONSIBLE RECYCLING®:2013





## U. Test Loads – Downstream Approvals

WORK INSTRUCTION			
Name:	<b>Downstream Vendor Selection Program</b>		
Document No:	<b>WORK.01.08.01</b>	Revision No:	<b>06</b>
Owner:	Director, Quality & Process Excellence		
Create date:	7/20/2016	Page:	<b>1 of 4</b>



### 1. Purpose

Call2Recycle shall be accountable for the management of focus materials both onsite and in the selection of downstream vendors in a manner protective of worker health and safety, public health, and the environment.

Call2Recycle has established, implemented and maintains the following downstream vendor selection program which outlines the requirements for initial and on-going due diligence

### 2. Definitions & Abbreviations

**Carrier:** A transportation company contracted by Call2Recycle to transport a shipment from collection site to the sorter facility.

**Notice of Violation (NOV):** Any public record with a regulating agency (local, state or federal) of a violation of that agency's regulations.

**Sorter:** A sorter is a facility contracted to handle (reclaim, recover, treat, sort, ship, transfer, package for transportation, transport, or temporarily store) batteries collected through the Call2Recycle program. The sorter is the consignor or shipper of goods within the Call2Recycle program.

**Processor:** A processor is a licensed facility contracted by Call2Recycle to handle (reclaim, recover, treat, sort, ship, transfer, package for transportation, transport, or temporarily store) batteries collected through the Call2Recycle program. The processor is the consignee or receiver of goods on all shipping documentation from the sorter.

**INFOR:** A Customer Relationship Management (CRM) database in which all collection site, sorter and processor records and receipts are maintained.

### 3. Procedure

#### Initial Due Diligence

- Potential vendors shall complete and return [FORM.01.08.01-Downstream Vendor Questionnaire](#) (or provide equivalent documentation).
  - If potential vendors are completing [FORM.01.08.01-Downstream Vendor Questionnaire](#), the inclusion of a signed copy of the R2 Addendum found on p 4 must be received and reviewed.
  - If potential vendors are not completing [FORM.01.08.01-Downstream Vendor Questionnaire](#) and are instead providing equivalent documentation, a signed copy of [FORM.01.08.02-Downstream Vendor R2 Addendum](#) must be received and reviewed
- If acceptable, Call2Recycle shall conduct a desk audit of the vendor to ensure they meet Call2Recycle's requirements and R2 requirements. The desk audit shall be recorded on [FORM.01.08.02-R2 Desk Audit Checklist](#). All required due diligence required by R2 shall be conducted and records maintained.
- If the desk audit is acceptable, Call2Recycle may elect to conduct an on-site audit of the vendor to ensure they meet Call2Recycle's requirements and R2 requirements. The on-site audit shall be recorded on the R2 On-Site Audit Checklist. Determination of whether an on-site audit should be conducted is based on vendor history,



WORK INSTRUCTION			
Name:	Downstream Vendor Selection Program		
Document No:	WORK.01.08.01	Revision No:	06
Owner:	Director, Quality & Process Excellence		
Create date:	7/20/2016	Page:	2 of 4



desk audit findings and/or customer requirements. Onsite audits are conducted on [FORM.01.08.03-Vendor Onsite Audit Template](#)

- After completion of the audit(s) and due diligence, a potential vendor will either be disqualified or presented for approval by the Board of Directors. Scheduling and coordination for presentation to the Board should be at the direction of the President and CEO.
- Upon Board approval, the vendor will be added to **PUB.01.08.06-FMMP**. Call2Recycle will create a new account for the vendor in Infor and attach each document associated with approval to the Infor account as an Asset. Documents with expirations are to be entered into Infor with their expiration dates in-order-to follow the WORK.01.08.02-Asset Stop Light Report process.
- Call2Recycle's material flow chart is maintained electronically in Infor in the Internal Receipt Routing table. It lists the vendors used to process focus materials to the end process and will be updated when new vendors are approved and added.

#### Test Loads

Test loads are shipments of batteries that are directed to conditionally approved processors. These processors must meet the downstream processor due-diligence standards described above (and all requirements of the R2:2013 standard), but do not require Board Approval. Final Approval for processors receiving test loads may be granted by the President and CEO. Test Loads are exclusively for conditionally approved processors that are conducting research into new recycling processes where volumes of battery feedstock is needed for process validation, research and recycling efficiency rate (RER) calculations.

#### On-Going Diligence

- Call2Recycle shall assure on-going conformance of the downstream vendor to Call2Recycle requirements by conducting annual desk and/or on-site audits. Audit frequency may be increased if there is a concern. All ongoing audits shall be documented and records maintained electronically in Infor as assets associated with the vendor's account profile. Records with an expiration date will have the expiration associated with the asset.
- Annually during On-Going Due Diligence, a signed R2 Addendum for each account should be verified and reviewed.
  - This will be saved in Infor as an asset and may be on either form: [FORM.01.08.01-Downstream Vendor Questionnaire](#) or [FORM.01.08.02-Downstream Vendor R2 Addendum](#)
  - Review should be documented on the [FORM.01.08.02 R2 Desk Audit Checklist](#)

#### Due Diligence for R2 Certified Downstream Vendors

- Downstream vendors who are R2 certified must still go through Initial Due Diligence and On-Going Due Diligence.
- Provision 5(g) of the R2:2013 Standard states, "If the R2:2013 electronics recycler uses an R2:2013 certified downstream facility, then verification of conformance to 5(e)(1) and 5(e)(6) satisfies the due diligence requirements of 5(e) and 5(f)."
- Initial Due Diligence and On-Going Due Diligence of R2:2013 certified downstream facilities must document verification of conformance to Provisions 5(e)(1) and 5(e)(6), which state that:  
(e) For shipments of removed FMs, and shipments of equipment and components containing FMs, an R2:2013 electronics recycler shall select both domestic and international downstream vendors that:"



WORK INSTRUCTION			
Name:	Downstream Vendor Selection Program		
Document No:	WORK.01.08.01	Revision No:	06
Owner:	Director, Quality & Process Excellence		
Create date:	7/20/2016	Page:	3 of 4



- (1) Conform to the R2:2013 electronics recycler's FM Management Plan (developed in accordance with and including the requirements set forth in Sections (b) - (d) above), and
  - (6) Conform to Provision 7 (Tracking Throughput), documenting the flow of all FMs down the Recycling Chain, and
4. Throughput tracking that involves imports/exports of FM must be verified against the legal requirements for transboundary movement found in PUB.01.07.01-Legal Requirements. If an evaluation of the legal requirements for transboundary movement for the FM being considered are not listed on PUB.01.07.01-Legal Requirements, then an evaluation must be made, and PUB.01.07.01-Legal Requirements must be updated.

#### Requirements Specific to TWA

As the exclusive handler of data-bearing devices and other non-battery material for Call2Recycle, there are specific requirements for completing the ongoing due diligence for TWA including the following steps, which must be completed and verified annually. This must be documented on FORM.01.08.02-R2 Desk Audit Checklist

1. Review and verify that the following document is accurate and up to date: TWA Process Control (Quality) Plan
2. Review and verify that the following document is accurate and up to date: TWA Approved Vendor List - Ready for Repair for C2R
3. Verify that all shipping confirmation for loads sent to vendors on TWA Approved Vendor List - Ready for Repair for C2R have been received from TWA and attached to their account in Infor
4. Request and receive from TWA a copy of the Call2Recycle\_\_Inc.\_Summary\_Report for the previous calendar year.

#### Requirements for Transportation Carriers

Prior to being added as Transportation Carriers and annually during due diligence the following steps should be taken.

1. Obtain carrier COI and ensure that Call2Recycle insurance requirements are met (\$1MM USD per incident and \$4MM USD general aggregate).
  - a. Carriers operating on behalf of brokers (like FreightQuote) are covered by the broker umbrella COI coverage limits
2. Visit FMCA SAFER System at <https://safer.fmca.dot.gov>
  - a. Search the carrier by name
  - b. Document the carrier location, Authorization for Hire status, Out of Service Inspections US, Out of Service % US, Out of Service Inspections Canada, Out of Service % Canada and SAFER System Safety Rating.
    - i. The SAFER System Safety Rating may not be available for smaller carriers
  - c. Compare the Out of Service %'s against the national average of 20.72%. Carriers with an OOS % below the national average may be approved for use. Carriers with OOS % at or above the national average require additional consideration before being approved for use. Additional consideration may include evaluation of specific out of service events or the number of OOS inspections relative to the total inspections (ie a carrier with only 2 inspections and 1 OOS inspection will have a 50% OOS rate but may still be appropriate for inclusion)
3. Document all information in item 2(b) and the Yes/No Call2Recycle Approval on [PUB.01.08.05- Transportation Carrier SAFER Check](#)



WORK INSTRUCTION			
Name:	Downstream Vendor Selection Program		
Document No:	WORK.01.08.01	Revision No:	06
Owner:	Director, Quality & Process Excellence		
Create date:	7/20/2016	Page:	4 of 4



#### 4. References

The following table lists all Work Instructions (WORK), Forms (FORM) and Publications (PUB) referenced in this document.

Document No:	Document Name:
<a href="#">FORM.01.08.01</a>	Downstream Vendor Questionnaire
<a href="#">FORM.01.08.02</a>	R2 Desk Audit Checklist
<a href="#">FORM.01.08.03</a>	Vendor Onsite Audit Template
<a href="#">PUB.01.08.05</a>	Transportation Carrier SAFER Check

#### 5. Revision History

The following table lists all revisions (including the original issue) to this Word Instruction, the revision date, a description of the change and the individual who made the revision.

Rev:	Rev Date:	Description of Change:	Revised By:
01	7/20/2016	Original issue	C Kreung
02	1/3/2018	Updated SLX with INFOR, added onsite audit details, link to audit	C Kreung
03	5/21/2018	Changed name, added frequency	C Kreung
04	9/20/2018	Changed name, revised program to bring in line with Downstream Vendor Questionnaire and R2 Audit Checklist	E Frederickson
05	1/31/2018	Renamed and reformatted	E Frederickson
06	12/2/2019	Added requirements for Due Diligence for R2 Certified Downstream Vendors	E Frederickson
07	01/15/2020	Added Requirements Specific to TWA	E Frederickson
08	01/20/2020	Added requirements for signed R2 Addendum for all DSV's who handle data bearing devices. Added requirements for verifying Transportation Carriers in SAFER System	E Frederickson
09	02/25/2020	Added clarifying language on Test Loads	E Frederickson





## Downstream Vendor Questionnaire

<b>VENDOR COMPANY INFORMATION</b>	
Company Name:	
Facility Address:	
Mailing Address (if different from above):	
Contact Name:	
Phone:	Fax:
E-Mail:	Company Website:

<b>COMPANY HISTORY</b>	
Years in Operation under current owner:	Current Owner(s)/Principal(s):
If subsidiary, list parent company:	
Previous Owners and dates of operation:	
Current number of employees:	Size of facility (in sq. ft.):
Number of Shifts:	Hours of operation:

<b>MATERIALS PROCESSED for Call2Recycle:</b> Check all that are <u>applicable</u> : <input type="checkbox"/> Batteries <input type="checkbox"/> Cell Phones <input type="checkbox"/> Other: _____ <input type="checkbox"/> Other: _____	<b>Monthly Capacity: (In Pounds):</b>  
--	---

<b>PROCESS INFORMATION</b> Please describe the processes used to handle Call2Recycle's materials:          
--



#### PROCESS INFORMATION

Please indicate all materials generated by the processing of Call2Recycle's material and the sub-vendors used to process the material further.

Material Generated	How are the materials processed or disposed? (Include Processing technology, if applicable.)	Material Final Destination (Include vendor name and address)

#### PERMITS, LICENSES AND INSURANCE

Business Licenses Permits:	<input type="checkbox"/> Copies attached <input type="checkbox"/> N/A Regulatory Agency: Regulatory Agency Phone Number:
Environmental Permits:	<input type="checkbox"/> Copies attached <input type="checkbox"/> N/A Regulatory Agency: Regulatory Agency Phone Number:
Waste Permits:	<input type="checkbox"/> Copies attached <input type="checkbox"/> N/A Regulatory Agency: Regulatory Agency Phone Number:
Air Emission Permits:	<input type="checkbox"/> Copies attached <input type="checkbox"/> N/A Regulatory Agency: Regulatory Agency Phone Number:
Water Permits:	<input type="checkbox"/> Copies attached <input type="checkbox"/> N/A Regulatory Agency: Regulatory Agency Phone Number:
Insurance Coverage:	<input type="checkbox"/> Copies attached
Workers Compensation Coverage:	<input type="checkbox"/> Copies attached

#### ENVIRONMENTAL MANAGEMENT SYSTEM

Is the facility ISO 14001 certified?	<input type="checkbox"/> Yes, please attach cert	<input type="checkbox"/> No
Is the facility e-Stewards certified?	<input type="checkbox"/> Yes, please attach cert	<input type="checkbox"/> No
Is the facility R2 certified?	<input type="checkbox"/> Yes, please attach cert	<input type="checkbox"/> No
Does the company have a documented Environmental Policy and Environmental Management System?	<input type="checkbox"/> Yes, please attach copy	<input type="checkbox"/> No

FORM.01.08.01-Downstream Vendor Questionnaire  
Effective Date: 12-23-2019

Rev 3  
Page 2 of 4



Does the company have a commitment to the prevention of pollution?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the company have a commitment to continual improvement?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Have there been any regulatory violations, fines, citations, corrective actions or remediation against the company?	<input type="checkbox"/> <u>Yes</u> - please attach explanation	<input type="checkbox"/> No

#### OCCUPATIONAL HEALTH & SAFETY

Is the facility ISO 45001 certified?	<input type="checkbox"/> Yes, please attach cert	<input type="checkbox"/> No
Does the company have a documented Occupational Health & Safety Policy and OHS Management System?	<input type="checkbox"/> Yes, please attach copy	<input type="checkbox"/> No
Does the company have documented procedures for identifying and complying with all applicable health and safety regulations (federal, state, county, city and industry)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Have there been any regulatory violations, fines, citations, corrective actions or remediation against the company?	<input type="checkbox"/> <u>Yes</u> - please attach explanation	<input type="checkbox"/> No
Does the company have annual health & safety training for employees?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

#### HAZARDOUS and UNIVERSAL WASTE PROCESSING, HANDLING & STORAGE

Check all on-site hazardous and universal waste storage types and regulatory capacities:		
<input type="checkbox"/> Tanks	Capacity:	
<input type="checkbox"/> Drums	Capacity:	
<input type="checkbox"/> Other (specify) _____	Capacity:	
Does the company have documented procedures for processing, handling and storage of hazardous and universal waste that complying with all applicable regulations (federal, state, county, city and industry)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the company have documented procedures for spills, including responding to and reporting to regulatory agencies, if required?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Form Completed By: (Name and Title)	Signature:	Date:
-------------------------------------	------------	-------



## R2 Desk Audit Checklist

Name of Downstream Vendor: \_\_\_\_\_

R2 Certified? Yes No

If Yes, complete 1,2, 4, 7, and 9

If No, complete 1 -9

**1. Downstream Vendor Questionnaire**

- a. Sent the Downstream Vendor Questionnaire: \_\_\_\_\_
- b. Received and filed signed Downstream Vendor Questionnaire: \_\_\_\_\_
- c. Verified that a signed copy of the R2 Addendum is on-file in Infor (required for all vendors): \_\_\_\_\_

**2. FM Management Plan**

- a. Sent CALL2RECYCLE's Focus Material Management Plan: \_\_\_\_\_
- b. Received Downstream process to ensure it meets CALL2RECYCLE's FMMP: \_\_\_\_\_

**3. Documented system to manage environmental, health, and safety risks and legal requirements**

- a. Certification: \_\_\_\_\_ (Attach evidence)
- b. Other: \_\_\_\_\_ (Attach evidence)

**4. Compliance with all applicable environmental and health and safety legal requirements and maintain a list of its environmental permits and copies of each**

- a. Environmental permits provided and reviewed: \_\_\_\_\_

**5. Assurance that any additional downstream vendors in the Recycling Chain of FMs from CALL2RECYCLE's conforms to these subsections (1) – (7), and Section 5(f), or allow CALL2RECYCLE to confirm this information with each of its relevant downstream vendors**

- a. Evidence Provided: \_\_\_\_\_

**6. Provision 6 (Reusable equipment), if the downstream vendor is sending any of CALL2RECYCLE's focus material for Reuse (not recycling or recovery),**

- a. Evidence Provided: \_\_\_\_\_



## R2 Desk Audit Checklist

### 7. Provision 7 (Tracking Throughput) for documenting the flow of all FMs down the Recycling Chain

- a. Throughput tracking must be verified through the Recycling Chain for all FM, including FM that is sent to R2:2013 certified DSV's. Refer to *PUB.01.08.03-Focus Material Management Flow*. Through put tracking is required through to the last DSV listed on *PUB.01.08.03-Focus Material Management Flow* for all FM streams.
- b. List Reviewed Import, Transit and Export notifications and permits.
  - i. Throughput tracking that involves imports/exports of FM must be verified against the legal requirements for transboundary movement found in *PUB.01.07.01-Legal Requirements*. If an evaluation of the legal requirements for transboundary movement for the FM being considered are not listed on *PUB.01.07.01-Legal Requirements*, then an evaluation must be made, and *PUB.01.07.01-Legal Requirements* must be updated.

---



---



---

### 8. Provision 10 (Security), ensuring security of the equipment down the recycling chain

- a. Evidence Provided:

---



---



---

### 9. Additional:

Workers Comp Insurance Certificate:	Yes	No
General Insurance Certificate:	Yes	No
Do they have an Environmental policy?	Yes	No
If yes, do we have a copy?	Yes	No
Do they have a Health and Safety policy?	Yes	No
If yes, do we have a copy?	Yes	No
Have there been any regulatory fines?	Yes	No
If yes, do we have an explanation	Yes	No





## R2 Desk Audit Checklist

### 10. Summary:

Approved \_\_\_\_\_

Not Approved \_\_\_\_\_

Date of Completed Desk Audit: \_\_\_\_\_

Completed By: \_\_\_\_\_

If Approved, date added to the Approved Vendor List \_\_\_\_\_

If Approved, date added to the Material Flow Chart (including downstream vendors)

\_\_\_\_\_



V. Battery Solutions Environmental Audit Package



## Battery Solutions Environmental Audit Package 2019

### Facility Locations

Battery Solutions, LLC ( Corporate Headquarters )	Battery Solutions, LLC
4930 Holtz Drive	618 E. Auto Center Drive, Suite 111
Oakland County	Maricopa County
Wixom, MI 48393	Mesa, AZ 85204
800-852-8127	800-852-8127
248-446-3001	480-248-3100
Fax 248-446-1927	Fax 480-248-3101

Email: [customerservice@batterysolutions.com](mailto:customerservice@batterysolutions.com)

Website: [www.batterysolutions.com](http://www.batterysolutions.com)

NOTE: \*\*\*Attachments to follow at end of full audit package  
(no attachments for introductory audit package)

## Quality, Environmental Health and Safety Policy

The management team of Battery Solutions, LLC ("Battery Solutions") is committed to ensuring that our Quality, Environmental, Health & Safety Policy provides a safe workplace for all our employees and visitors by complying with all applicable environmental and occupational health and safety laws and regulations while seeking sustainable technologies and practices as our business grows. Battery Solutions is committed to prevention of pollution and workplace injuries.

Our Quality, Environmental, Health & Safety objectives are:

- Complying with all applicable federal, state and local environmental health & safety laws, including to never dispose of universal waste batteries, electronics, regulated or hazardous waste in landfills or trash incineration.
- Complying with customer and product requirements and other quality, environmental, health and safety requirements.
- Maintaining of our R2/RIOS™ certification.
- Contributing to the circular economy in all our practices.
- Striving to meet or exceed expectations and industry best practices while delivering exceptional performance to our clients, business partners, investors and the community.
- Emphasizing our culture of continuous improvement and lean performance.
- Continually reviewing and improving procedures and systems to maximize efficiency and enhance quality and to provide a framework for establishing quality, environmental, health and safety goals.
- Creating and maintaining an encouraging work atmosphere promoting leadership, collaboration, problem solving and innovative thinking.

All employees are aware, and understand both the letter, and intent of this policy, as well as understand their responsibilities as it relates to quality, environmental compliance, and safe management of the material in our custody.



Corporate & Permit Information	
<b>Battery Solutions is a Delaware Corporation</b> <b>***Business Certificate Attached</b>	
Federal Tax ID # *** W9 Attached	90-0910860
SIC Code	5093-0500
NAICS Code:	423930
D&B #	84 930 7608
Michigan EPA ID # ***Attached	MIK 241 575 671
Arizona EPA ID # ***Attached	AZR 000 519 256
ADEQ Battery Collection/Recycling Authorization **Attached	#173
US DOT HazMat # ***Attached	05812 550 096UW expires 6/30/2020
Michigan No Exposure ***Attached	Paperless System Expires 11/06/2023 Permit Number NEC186792 v1.0
Arizona No Exposure ***Attached	Certificate #AZRNED-1213
Material Handling – Battery Recycling	
<ul style="list-style-type: none"> <li>• Large quantity handler of Universal Waste</li> <li>• Manage lead-acid chemistry batteries under 40 Code of Federal Regulations part 266 subpart G</li> <li>• Manage logistics from client location, transport, identify, segregate, consolidate, and repackage all battery chemistries</li> <li>• Ship out full trailer loads of each chemistry type to audited and approved RCRA “Part B” permitted recycling plants, when applicable.</li> <li>• No hazardous waste accepted</li> <li>• No onsite breaking, shredding, draining, or reducing of batteries, with the exception of alkaline batteries.</li> </ul>	
Processing Capacity and Capabilities	
<ul style="list-style-type: none"> <li>• No capacity or capability issues <ul style="list-style-type: none"> <li>○ Wixom location – 95,755 square feet</li> <li>○ Mesa location – 57,272 square feet</li> </ul> </li> <li>• No permitting capacities</li> <li>• Processing capabilities vary by battery chemistry. Example: dry cell sorting is currently approximately 200,000 Lbs./week on a one shift operation. We can add a second shift or increase sort employee count to increase production.</li> <li>• Alkaline battery processing to end of life ( NON -RCRA, Non-Hazardous, unregulated material ) via our Battery Solutions Recovery alkaline processing division.</li> </ul>	

## Wixom, Michigan Facility – January 2019

Artist rendering- new photos coming Fall 2019



Address	4930 Holtz Drive Wixom, MI, 48390
Building Size	95,755 Square Feet (Warehouse 84,450; Office 11,305)
Site Information	12.361 Acres Zoned Industrial
Property Background	No Previous Use – Vacant Land
County	Oakland
<b>Surrounding Land, Water &amp; Population</b>	
Surrounding Land Usage	Industrial
Water Source	Private Well / Municipal Sewer
Distance to Nearest Offsite Water Well	North Adjoining property 415 feet East
Distance to Nearest Body of Water	1,400 ft. NW of property (unnamed tributary)
Nearby Population	1 Mile
<b>Wixom, Michigan Regulatory Contacts</b>	
Department of Environmental Quality	US Department of Transportation
Gerald E. Kelly Constitution Hall – Atrium North 525 West Allgegan Street P.O. Box 30241 Lansing, MI 48909-7741 Phone: 517-335-5139 Email: <a href="mailto:kellyg@michigan.gov">kellyg@michigan.gov</a>	Dan Richards Investigator 2300 East Devon Avenue Suite 478 Des Plaines, IL 60018 Phone: 847-294-8589 Email: <a href="mailto:daniel.richards@dot.gov">daniel.richards@dot.gov</a>

### Nearby facilities:

The North adjoining property, identified as 4820 Holtz Dr. is occupied by Schupan Recycling, a light industrial building with operations related to the bottle and can recycling industry. The building housing Schupan was built for them in 2006 and prior to that was vacant land. The East adjoining property, identified as 4925 Holtz Dr., is currently occupied by Kennedy Industries, a pump, valve and control repair and sales business. Prior to 2014 the land that Kennedy's building occupies was vacant. The South adjoining property, 52251 Pontiac Trail, is currently occupied by Lyon Oaks County Park and Golf Course ( Which was developed in the 2000's). The West adjoining property is currently vacant land. A Phase I Environmental Site assessment was done in October 2017 prior to build.



## Mesa, Arizona Facility - 2017



Address	618 E. Auto Center Drive, Suite 111 Mesa, AZ 85204
Building Size	57,272 square feet
Site Information	1.5 Acres Zoned Industrial Park
Property Background	No Previous Use – Farmland
County	Maricopa
<b>Surrounding Land, Water &amp; Population</b>	
Surrounding Land Usage	Commercial and Farmland
Water Source	City Water and Sewer
Distance to Nearest Offsite Water Well	N/A
Distance to Nearest Body of Water	.5 Miles
Nearby Population	.5 Mile
<b>Mesa Arizona Regulatory Contacts</b>	
Department of Environmental Quality	US Department of Transportation
Michael Prigge, P.E. Manager ADEQ Solid Waste Plan Review Unit 1110 W. Washington Street Phoenix, AZ 85007 Phone: 602-771-4136 Fax: 602-771-2383 <a href="mailto:mnpr@azdeq.gov">mnpr@azdeq.gov</a>	Chris Michalski Senior Investigator 800 Bear Tavern Road Suite 306 West Trenton, NJ 08628 Phone: 609-989-2234 Email: <a href="mailto:chris.michalski@dot.gov">chris.michalski@dot.gov</a>

## EH&S Management System

Battery Solutions has an Environmental, Health & Safety management system built to comply with R2:213 Rev. 7/2013 / RIOS:2016 Rev. 11/2016 standards.

\*\*\*Management System Table of Contents Attached

\*\*\*Standard Process Flow Attached

\*\*\*Focus Material Management Plan Attached

## Certifications

Responsible Recycling (R2:2013) Rev. 7/2013 – Expires 9/9/2020

Recycling Industry Operating Standard (RIOS: 2016) Rev. Nov. 2016 – Expires 9/9/2020 \*\*\*Certificate Copies Attached

## Downstream Management

Battery Solutions conducts due diligence on all downstream vendors. Each downstream is audited annually via an onsite audit or a desk audit. Battery Solutions also works in partnership with an experienced auditing body to conduct and maintain audits ensuring our downstream vendors conform to certification standards and legal compliance. Provided there is an executed non-disclosure agreement on file, we are willing to share downstream information. Battery Solutions DOES NOT share specific downstream documents with upstream clients as we are bound by a non-disclosure agreement.

\*\*\*Downstream Processor Due Diligence Procedure Attached

## Compliance Reporting

OSHA 300 logs & SARA Tier II reporting are completed annually

\*\*\*2018 OSHA 300A Log Attached

\*\*\*2018 Michigan Tier II Emergency and Hazardous Chemical Inventory Attached

\*\*\*2018 Arizona Tier II Emergency and Hazardous Chemical Inventory Attached

## Processes

- All battery shipments are identified before they are shipped to Battery Solutions, LLC and after they arrive. The shipping papers are scrutinized and the containers are inspected for labeling and content.
- The chemistry type of the batteries is identified with information supplied by the shipper. (i.e. make & model #, SDS sheets and/or digital pictures).
- We provide clients with a Confirmation of Reclamation that documents the battery types, quantity, EPA site ID #, and when the material was processed for reclamation. This certifies that the batteries were recycled within Local, State, and Federal regulations.
- Each shipment is assigned a tracking number before it is shipped. This number follows the shipment through the entire recycling process.

Planning, Preparation and Training	
Battery Solutions strives to have well-trained, well-informed employees. As such, we comply with local, state, and federal regulations, the following training and information is exercised with employees. Employees are trained on the topics that effect their environment and their specific job. Training may not be limited to stated subjects below but will include them at a minimum.	
Pre-Work Training	Orientation and basic safety training is required and provided before new employees can begin working. Supervisors have a "Day 1" checklist of safety and facility policies along with plant tour.
Material Training/Training Guidelines	<ul style="list-style-type: none"> <li>• Acceptable materials</li> <li>• Hazardous materials familiarization</li> <li>• Battery chemistries</li> </ul>
Battery School	All chemistry sorters are put through an intense 10-day training program which trains employees on the types and chemistries while also enforcing safety and the need for PPE.
Safety Training / Hazard Response Procedures	<p>General Safety</p> <ul style="list-style-type: none"> <li>• Personal protective equipment (PPE)</li> <li>• Warehouse safety rules</li> <li>• Office safety rules</li> <li>• Accident reporting rules</li> <li>• First aid practices</li> <li>• Disciplinary policy</li> </ul> <p>Spill Response Training:</p> <ul style="list-style-type: none"> <li>• Sulfuric acid electrolyte neutralized using soda ash</li> <li>• Potassium hydroxide electrolyte neutralized using citric acid</li> </ul> <p>Hazard Communication</p> <ul style="list-style-type: none"> <li>• GHS 2012</li> <li>• Safety data sheets</li> </ul> <p>Fire Safety</p> <ul style="list-style-type: none"> <li>• Building fire exit inspections</li> <li>• Portable fire extinguisher rules</li> <li>• Evacuation plan procedures</li> <li>• Fire prevention rules and procedures</li> </ul> <p>Emergency Action Plan</p> <ul style="list-style-type: none"> <li>• Escape procedures and exit routes</li> <li>• Accounting for employees</li> <li>• Alarm system and notification of emergencies</li> <li>• Employee training</li> </ul>
Forklift (powered industrial trucks) Training , Aerial Platform Training	Training, testing, and licensing as required by state and federal regulations

### Facility Truck Drivers

- Battery Solutions drivers are Class B HazMat Endorsed
- Trained on spill response clean up and removal including HAZWOPER certification
- Forklift /PIT operation certified
- Trained to handle, package, load and transport hazardous materials
- Annual hazardous material familiarization training
- Random drug testing – driver drug testing pool

### Corporate Executive Leadership

- CEO – Thomas Bjarnemark
- VP Finance – Pending - Acting Thomas Bjarnemark
- VP, Operations – George Bielert
- VP, Sales - Dawn New-Echlin
- Director, Commercial Sales Support – Doug Smith
- Director, Marketing Communications – Danielle Spalding
- Director, Sales Operations – Kim Wireman
- Director, Global Logistics and Fulfillment – Stephanie Zemaitis

### Site Security and Surveillance

- Alarmed Security system
- Interior and Exterior 24-hour camera surveillance ( Accessible remotely as well)
- Heat and fire alarm system
- Incoming container inspection for non-conforming materials
- Weekly off-site customer data back-up

### Client Liability Protection

- General Liability – \$1,000,000 each occurrence \*\*\*
- Automobile Liability – \$1,000,000 combined single limit (each accident) \*\*\*
- Excess/Umbrella Liability – \$15,000,000 \*\*\*
- Workers Compensation – \$2,000,000 each occurrence \*\*\*
- Products/Completed Operations – \$3,000,000 each occurrence \*\*\*
- Pollution Legal Liability - \$15,000,000 \*\*\*
- Environmental due diligence audits on recycling facilities
- Battery Solutions, LLC acts as a protective barrier to liability for clients
- Certificates of Reclamation (COR) for all businesses

\*\*\*Insurance Certificates Attached

\*\*\*COR Samples Attached



# Request for Taxpayer Identification Number and Certification

Give Form to the  
requester. Do not  
send to the IRS.

► Go to [www.irs.gov/FormW9](http://www.irs.gov/FormW9) for instructions and the latest information.

Print or type.  
See Specific Instructions on page 3.

1 Name (as shown on your income tax return). Name is required on this line; do not leave this line blank.

**BATTERY SOLUTIONS, LLC**

2 Business name/disregarded entity name, if different from above

3 Check appropriate box for federal tax classification of the person whose name is entered on line 1. Check only **one** of the following seven boxes.

☐ Individual/sole proprietor or single-member LLC ☐ C Corporation ☐ S Corporation ☐ Partnership ☐ Trust/estate

☒ Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=Partnership) ► **P**

**Note:** Check the appropriate box in the line above for the tax classification of the single-member owner. Do not check LLC if the LLC is classified as a single-member LLC that is disregarded from the owner unless the owner of the LLC is another LLC that is **not** disregarded from the owner for U.S. federal tax purposes. Otherwise, a single-member LLC that is disregarded from the owner should check the appropriate box for the tax classification of its owner.

☐ Other (see instructions) ►

4 Exemptions (codes apply only to certain entities, not individuals; see instructions on page 3):

Exempt payee code (if any) \_\_\_\_\_

Exemption from FATCA reporting code (if any) \_\_\_\_\_

(Applies to accounts maintained outside the U.S.)

5 Address (number, street, and apt. or suite no.) See instructions.

**4930 HOLTZ DR**

6 City, state, and ZIP code

**WIXOM, MI 48393**

7 List account number(s) here (optional)

Requester's name and address (optional)

## Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the instructions for Part I, later. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN*, later.

**Note:** If the account is in more than one name, see the instructions for line 1. Also see *What Name and Number To Give the Requester* for guidelines on whose number to enter.

Social security number

\_\_\_\_ - \_\_\_\_ - \_\_\_\_

or

Employer identification number

9 0 - 0 9 1 0 8 6 0

## Part II Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
3. I am a U.S. citizen or other U.S. person (defined below); and
4. The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

**Certification instructions.** You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions for Part II, later.

Sign  
Here

Signature of  
U.S. person ►

Date ►

1/2/19

## General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

**Future developments.** For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to [www.irs.gov/FormW9](http://www.irs.gov/FormW9).

## Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) which may be your social security number (SSN), individual taxpayer identification number (ITIN), adoption taxpayer identification number (ATIN), or employer identification number (EIN), to report on an information return the amount paid to you, or other amount reportable on an information return. Examples of information returns include, but are not limited to, the following.

- Form 1099-INT (interest earned or paid)

- Form 1099-DIV (dividends, including those from stocks or mutual funds)
  - Form 1099-MISC (various types of income, prizes, awards, or gross proceeds)
  - Form 1099-B (stock or mutual fund sales and certain other transactions by brokers)
  - Form 1099-S (proceeds from real estate transactions)
  - Form 1099-K (merchant card and third party network transactions)
  - Form 1098 (home mortgage interest), 1098-E (student loan interest), 1098-T (tuition)
  - Form 1099-C (canceled debt)
  - Form 1099-A (acquisition or abandonment of secured property)
- Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN.

If you do not return Form W-9 to the requester with a TIN, you might be subject to backup withholding. See What is backup withholding, later.



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C HEIDI GREETHER  
DIRECTOR

October 30, 2018

Thomas Edwards Jr  
Battery Solutions LLC  
4930 Holtz Dr  
Wixom, MI 48393-

Dear Thomas:

SUBJECT: Application Submitted to Obtain a Site Identification (ID) Number  
Hazardous Waste Generator Status: **SQG and LIB**

This letter confirms that the Michigan Department of Environmental Quality (MDEQ) received the information you submitted on an EQP5150 (Site ID form) to obtain a Site ID number issued under Part 111, Hazardous Waste Management, or Part 121, Liquid Industrial Waste, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA).

The Site ID number **MIK241575671** has been issued for the site located at: **4930 Holtz Dr, Wixom, MI 48393**. Please note you may be contacted for additional information.

If you wish to review the information on record regarding this site you can log onto the MDEQ Web site at <http://www.michigan.gov/deq>. Click on "WASTE", then under "Featured Online Services" click on "Waste Data System". Enter the Site ID number in the "Quick Search" and click "GO". This will bring up all of the information for this site under the Hazardous Waste or Liquid Industrial Waste Programs.

If you need to make any corrections, changes, or additions to the site data, or change the site contact information, please do so on the Site ID Form and fax, e-mail, or mail it to the MDEQ. If you need to obtain a new Site ID number because the business moved to another location (Site ID number is assigned to the physical location), please go to the Waste Data System as noted above and follow the instructions on the first page to print a Site ID form and pay on-line with a credit card. Then fax your completed Site ID form and credit card receipt to 517-373-4797.

If you do not have access to the Internet you can obtain a blank copy of the form by contacting the MDEQ at 517-284-6597 to request a paper copy of the Site ID form be sent or faxed to you.

If you have any questions feel free to contact Ms. Jane Wysack at 517-284-6602 or [wysackj@michigan.gov](mailto:wysackj@michigan.gov).

Sincerely,

Richard A. Conforti, Jr., P.E., Unit Chief  
Management and Tracking Unit  
Hazardous Waste Section  
Waste Management and Radiological Protection Division

cc: Southeast Michigan District Office

[Quick Search](#)[Advanced Search](#)[Site ID](#)[Recent Sites](#)[Site](#) [Contacts](#)**497456 / MIK241575671 BATTERY SOLUTIONS LLC**  
**4930 HOLTZ DR, WIXOM, MI 48393****Site****Site Name**

BATTERY SOLUTIONS LLC

**Site Identification**

<b>WDS ID Number:</b>	497456	<a href="#">History...</a>
<b>Site ID Number:</b>	MIK241575671	<a href="#">History...</a>
<b>Legal Site Name:</b>	BATTERY SOLUTIONS LLC	<a href="#">History...</a>
<b>Specific Site Name:</b>	BATTERY SOLUTIONS LLC	<a href="#">History...</a>
<b>District:</b>	SOUTHEAST MICHIGAN	

**Address Identification**

<b>Location Address</b> 4930 HOLTZ DR WIXOM MI 48393	<b>Mailing Address</b> 4930 HOLTZ DR WIXOM MI 48393
<a href="#">History...</a>	<a href="#">History...</a>

**Miscellaneous**

<b>Tax Number:</b> 90XXXXXX60	<a href="#">History...</a>
<b>No Number Because:</b>	

GPS Coordinates (provide five decimal places)

**Latitude Coordinate:** 42.52451  
**Longitude Coordinate:** -83.56485  
**Collection Method:** Lat/Long Interpolation**Receives All Waste?:** No**Railroad?:** No**Facility on Indian Reservation Land?:** No**Utilization Activities:****Scrap Tires Activities:****Scrap Tires Acres:****NAICS Codes (up to four six-digit codes):**

(The list of NAICS codes in WDS is based on the 2007 definitions provided by the U.S.Census Bureau.)

423930 - Recyclable Material Merchant Wholesalers

**Haz Waste Contact**

<b>First Name:</b>	THOMAS	<b>M.I.:</b>	L
<b>Last Name:</b>	EDWARDS JR		
<b>Phone Number:</b>	(248) 446-5633	<b>Ext:</b>	<b>Fax:</b>
<b>Alternate Phone:</b>			
<b>Email Address:</b>	TON@BATTERYSOLUTIONS.COM		

**Owner/Operator (1)****Activities (1)****Site ID Fees (1)****Comments (1)****Petitions (0)****Used Oil Biennial Reports (0)****Parceling (0)****Institutional Controls (0)****Exemptions (0)**

Date	Comment Type	Comment
10/30/2018	111/121-HW/LIW	INITIAL NOTIFICATION - BATTERY SOLUTIONS APPLIED FOR A SITE ID AS A SQG/LIB GENERATOR WHO ALSO GENERATES UNIVERSAL WASTE - JW

**SEND  
COMPLETED  
FORM TO:**  
The Appropriate  
State or Regional  
Office.

**United States Environmental Protection Agency  
RCRA SUBTITLE C SITE IDENTIFICATION FORM**



<b>1. Reason for Submittal</b>  MARK ALL BOX(ES) THAT APPLY	<b>Reason for Submittal:</b> <input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location) <input checked="" type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below) <input type="checkbox"/> Site was a TSD facility and/or generator of >1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)		
<b>2. Site EPA ID Number</b>	<b>EPA ID Number</b> A   Z   R   0   0   0   5   1   9   2   5   6		
<b>3. Site Name</b>	<b>Name:</b> Battery Solutions, LLC		
<b>4. Site Location Information</b>	<b>Street Address:</b> 618 E. Auto Center Drive, Ste 111		
	<b>City, Town, or Village:</b> Mesa		<b>County:</b> Maricopa
	<b>State:</b> AZ	<b>Country:</b> US	<b>Zip Code:</b> 85204
<b>5. Site Land Type</b>	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
<b>6. NAICS Code(s) for the Site (at least 5-digit codes)</b>	<b>A.</b> 4   2   3   9   3   0		<b>C.</b>
	<b>B.</b> 5   6   2   1   1   9		<b>D.</b>
<b>7. Site Mailing Address</b>	<b>Street or P.O. Box:</b> 5900 Brighton Pines Court		
	<b>City, Town, or Village:</b> Howell		
	<b>State:</b> MI	<b>Country:</b> US	<b>Zip Code:</b> 48843
<b>8. Site Contact Person</b>	<b>First Name:</b> Brian		<b>MI:</b> <b>Last:</b> Gallentine
	<b>Title:</b> VP Operations		
	<b>Street or P.O. Box:</b> 5900 Brighton Pines Court		
	<b>City, Town or Village:</b> Howell		
	<b>State:</b> MI	<b>Country:</b> US	<b>Zip Code:</b> 48843
	<b>Email:</b> bgallentine@batterysolutions.com		
	<b>Phone:</b> 248-446-3001	<b>Ext.:</b>	<b>Fax:</b> 248-446-1927
<b>9. Legal Owner and Operator of the Site</b>	<b>A. Name of Site's Legal Owner:</b> Metro East Valley Holdings, LLC		<b>Date Became Owner:</b> 7/8/2015
	<b>Owner Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	<b>Street or P.O. Box:</b> 1500 N. Priest Drive, #132		
	<b>City, Town, or Village:</b> Tempe		<b>Phone:</b> 602-452-2570
	<b>State:</b> AZ	<b>Country:</b> US	<b>Zip Code:</b> 85251
	<b>B. Name of Site's Operator:</b> Battery Solutions, LLC		<b>Date Became Operator:</b> 9/1/2016
	<b>Operator Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		



**10. Type of Regulated Waste Activity (at your site)**

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

**A. Hazardous Waste Activities; Complete all parts 1-10.**Y ☒ N ☐**1. Generator of Hazardous Waste**

If "Yes," mark only one of the following – a, b, or c.

- ☐ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs/mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material.

- ☒ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs/mo) of non-acute hazardous waste.

- ☐ c. CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities in 2-10.

Y ☐ N ☒

- 2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes," provide an explanation in the Comments section.

Y ☐ N ☒

- 3. United States Importer of Hazardous Waste**

Y ☐ N ☒

- 4. Mixed Waste (hazardous and radioactive) Generator**

Y ☐ N ☒**5. Transporter of Hazardous Waste**

If "Yes," mark all that apply.

- ☐ a. Transporter  
☐ b. Transfer Facility (at your site)

Y ☐ N ☒**6. Treater, Storer, or Disposer of Hazardous Waste**

Note: A hazardous waste Part B permit is required for these activities.

Y ☐ N ☒**7. Recycler of Hazardous Waste**Y ☐ N ☒**8. Exempt Boiler and/or Industrial Furnace**

- If "Yes," mark all that apply.  
☐ a. Small Quantity On-site Burner Exemption  
☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☒**9. Underground Injection Control**Y ☐ N ☒**10. Receives Hazardous Waste from Off-site****B. Universal Waste Activities; Complete all parts 1-2.**Y ☒ N ☐

- 1. Large Quantity Handler of Universal Waste** (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes," mark all that apply.

- a. Batteries ☒  
b. Pesticides ☐  
c. Mercury containing equipment ☒  
d. Lamps ☐  
e. Other (specify) \_\_\_\_\_ ☐  
f. Other (specify) \_\_\_\_\_ ☐  
g. Other (specify) \_\_\_\_\_ ☐

Y ☒ N ☐**2. Destination Facility for Universal Waste**

Note: A hazardous waste permit may be required for this activity.

**C. Used Oil Activities; Complete all parts 1-4.**Y ☐ N ☒**1. Used Oil Transporter**

If "Yes," mark all that apply.

- ☐ a. Transporter  
☐ b. Transfer Facility (at your site)

Y ☐ N ☒**2. Used Oil Processor and/or Re-refiner**

If "Yes," mark all that apply.

- ☐ a. Processor  
☐ b. Re-refiner

Y ☐ N ☒**3. Off-Specification Used Oil Burner**Y ☐ N ☒**4. Used Oil Fuel Marketer**

If "Yes," mark all that apply.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner  
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications



**D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K**

❖ You can ONLY Opt into Subpart K if:

- you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
- you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

Y ☐ N ☒ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories  
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:☐ a. College or University☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or universityY ☐ N ☒ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories**11. Description of Hazardous Waste****A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D006	D008	D009	D011

**B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.** Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

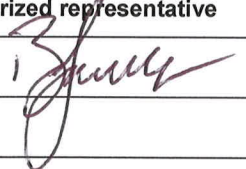

**12. Notification of Hazardous Secondary Material (HSM) Activity**

Y ☐ N ☒ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes," you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

**13. Comments**

**14. Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Brian Gallentine, VP Operations	9/16/2016

## ADDENDUM TO THE SITE IDENTIFICATION FORM: NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY


**ONLY fill out this form if:**

- ❖ You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent). See <http://www.epa.gov/epawaste/hazard/dsw/statespf.htm> for a list of eligible states; **AND**
- ❖ You are or will be managing excluded HSM in compliance with 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent) or you have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section.

**1. Indicate reason for notification. Include dates where requested.**

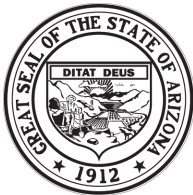
- ☐ Facility will begin managing excluded HSM as of \_\_\_\_\_ (mm/dd/yyyy).
- ☐ Facility is still managing excluded HSM/re-notifying as required by March 1 of each even-numbered year.
- ☐ Facility has stopped managing excluded HSM as of \_\_\_\_\_ (mm/dd/yyyy) and is notifying as required.

**2. Description of excluded HSM activity.** Please list the appropriate codes and quantities in **short tons** to describe your excluded HSM activity ONLY (do not include any information regarding your hazardous wastes). Use additional pages if more space is needed.

a. Facility code (answer using codes listed in the Code List section of the instructions)	b. Waste code(s) for HSM	c. Estimated short tons of excluded HSM to be managed annually	d. Actual short tons of excluded HSM that was managed during the most recent odd-numbered year	e. Land-based unit code (answer using codes listed in the Code List section of the instructions)

**3. Facility has financial assurance pursuant to 40 CFR 261.4(a)(24)(vi).** (Financial assurance is required for reclaimers and intermediate facilities managing excluded HSM under 40 CFR 261.4(a)(24) and (25))

Y ☐ N ☐ Does this facility have financial assurance pursuant to 40 CFR 261.4(a)(24)(vi)?



Douglas A. Ducey  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street Phoenix, Arizona 85007  
(602) 771-2300 [www.azdeq.gov](http://www.azdeq.gov)



Misael Cabrera  
Director

MYDEQ-2016-0236A  
September 15, 2016

Shelly Messing  
BATTERY SI, LLC (FN)  
5900 BRIGHTON PINES CT  
HOWELL, MI 48843

**RE: Resource Conservation and Recovery Act (RCRA) EPA ID Number - AZR000519256**

Location: BATTERY SOLUTIONS, LLC  
Latitude: 33.383179 Longitude: 111.817143

Your facility is listed as: SQG.

The Arizona Department of Environmental Quality (ADEQ) has issued the above RCRA EPA ID number to your site. This number also referred to as "RCRA ID" is to be used on transport manifests and any other hazardous waste documents required under Subtitle C of RCRA.

This number is site specific and is to be used for the waste activity at this site only. If there are any changes to RCRA regulated activity at the above site, you must update the information immediately. If your facility ceases operations at this specific site you must deactivate this RCRA EPA ID. If your facility moves to a new location, you must apply for a new RCRA EPA ID prior to generating RCRA waste at the new location. You cannot use the EPA ID number assigned to your previous location. Your new location will be assigned a new EPA ID number specific to that site.

If your facility's RCRA waste activity at this site ceases because of closure or change of location, you must request deactivation of the EPA ID number assigned to this location. Failure to deactivate will require you to submit annual waste generation reports.

If you have any questions, or need assistance, please contact ADEQ at (602) 771-4173.

All correspondence regarding your RCRA EPA ID number must be directed to:

Arizona Department of Environmental Quality  
Waste Programs Division - Information Management Unit  
1110 W Washington Street  
Phoenix, AZ 85007

Southern Regional Office  
400 West Congress Street Suite 433 Tucson, AZ 85701  
(520) 628-6733

Printed on recycled paper



## ***BATTERY COLLECTION/RECYCLING FACILITY AUTHORIZATION***

*Issued to:*

**Battery Solutions, LLC**

*At the location of:*

**618 East Auto Center Drive, Suite 111, Mesa, Arizona 85204**

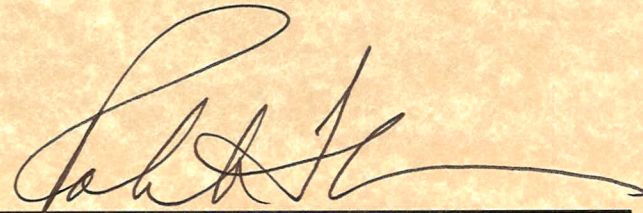
*This license is issued for the collection and/or recycling of lead acid batteries, and is subject to Arizona Revised Statute §44-1322 which governs the disposal of lead acid batteries.*

*This authorization will be valid as long as the facility is used for the purpose indicated above, and is maintained and operated in a satisfactory manner. This license is not transferable from person to person or vehicle to vehicle.*

*Number: 173*

*Issued: October 27, 2016*

*Expires: N/A*



***Robin A. Thomas, Acting Manager  
Solid/Hazardous Waste Section***





Douglas A. Ducey  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera  
Director

October 26, 2016  
PRU16-498  
LTF # 64821

Brian Gallentine  
Battery Solutions, LLC  
5900 Brighton Pines Court  
Howell, MI 48843

**Re: Battery Collection/Recycling Facility Authorization # 173  
Battery Solutions, LLC; 618 East Auto Center Drive, Suite 111; Place ID No. 150026**

Dear Mr. Gallentine:

The Arizona Department of Environmental Quality (ADEQ), Solid Waste Unit, received your application for the above-referenced facility on September 30, 2016. The application was reviewed and found to be complete. Enclosed is the Battery Collection/Recycling Facility authorization issued by ADEQ. This authorization is issued for Battery Solutions, LLC and is valid as long as the facility is used for the purpose indicated above, and is maintained and operated in a satisfactory manner. This authorization is not transferable from person to person or facility to facility.

If you have any questions, please contact Omid Rabbani, of my staff at (602) 771-4136, or toll-free at (800) 234-5677, ext. 771-4136.

Sincerely,

Robin Thomas, P.E.  
Acting Manager, Solid/Hazardous Waste Section  
Waste Programs Division

cc: facility file

Enclosure: Battery Collection/Recycling Facility Authorization No. 173

**UNITED STATES OF AMERICA  
DEPARTMENT OF TRANSPORTATION  
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION**



**HAZARDOUS MATERIALS  
CERTIFICATE OF REGISTRATION  
FOR REGISTRATION YEAR(S) 2019-2020**

**Registrant:** BATTERY SOLUTIONS LLC

ATTN: Thomas Edwards  
4930 Holtz Drive  
Wixom, MI 48393

This certifies that the registrant is registered with the U.S. Department of Transportation as required by 49 CFR Part 107, Subpart G.

This certificate is issued under the authority of 49 U.S.C. 5108. It is unlawful to alter or falsify this document.

**Reg. No: 051419550117B    Effective: July 1, 2019    Expires: June 30, 2020**

**HM Company ID: 55302**

**Record Keeping Requirements for the Registration Program**

The following must be maintained at the principal place of business for a period of three years from the date of issuance of this Certificate of Registration:

- (1) A copy of the registration statement filed with PHMSA; and
- (2) This Certificate of Registration

Each person subject to the registration requirement must furnish that person's Certificate of Registration (or a copy) and all other records and information pertaining to the information contained in the registration statement to an authorized representative or special agent of the U. S. Department of Transportation upon request.

Each motor carrier (private or for-hire) and each vessel operator subject to the registration requirement must keep a copy of the current Certificate of Registration or another document bearing the registration number identified as the "U.S. DOT Hazmat Reg. No." in each truck and truck tractor or vessel (trailers and semi-trailers not included) used to transport hazardous materials subject to the registration requirement. The Certificate of Registration or document bearing the registration number must be made available, upon request, to enforcement personnel.

For information, contact the Hazardous Materials Registration Manager, PHH-52, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, 1200 New Jersey Avenue, SE, Washington, DC 20590, telephone (202) 366-4109.

## Tom Edwards

**From:** MiWaters Support <DEQ-WRD-MiWaters@michigan.gov>  
**Sent:** Monday, January 28, 2019 7:16 AM  
**To:** Tom Edwards  
**Subject:** Submission Status Change Notification - HNJ-3Y2Q-WJH0Q, Battery Solutions LLC-Holtz Drive

MiWaters User,

This notification is to inform you that the status of the following application or service request has changed:

Submission Form: No Exposure Certification (NEC) for Exclusion of Coverage under the NPDES Storm Water Discharges Associated with Industrial Activity

Submission Reference Number: HNJ-3Y2Q-WJH0Q

Site Name: Battery Solutions LLC-Holtz Drive

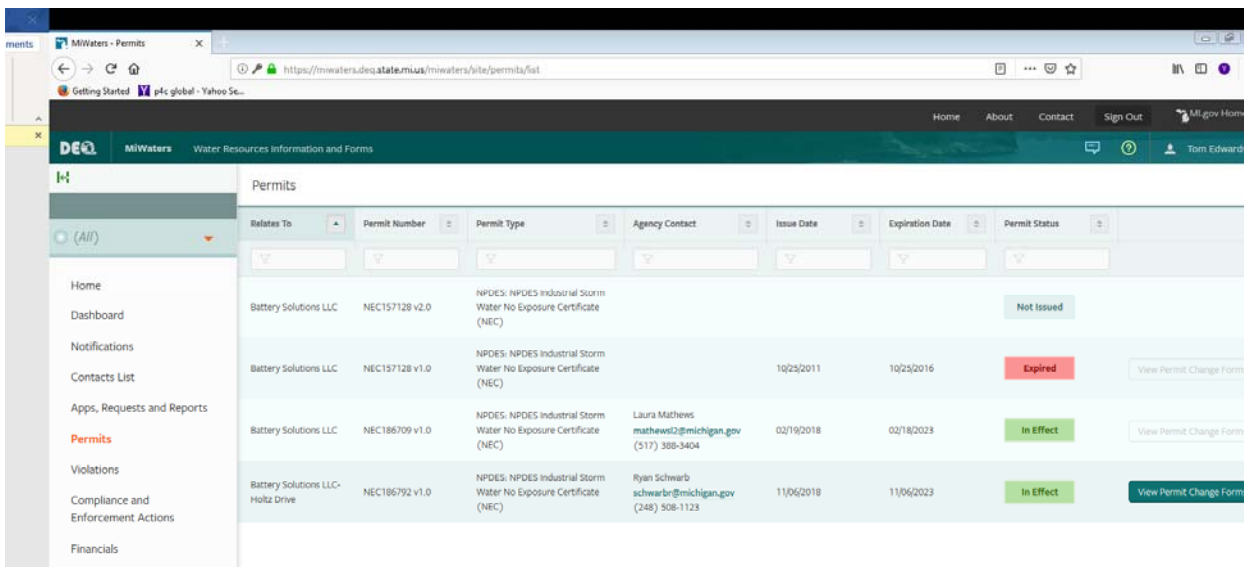
DEQ Processor: Karen Gutting

**New Status: Completed**

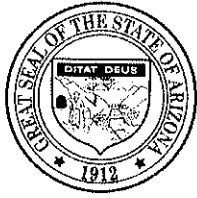
**New Status Effective Date: 01/28/19**

**Expiration Date : 11/06/2023**

This is an automated notification generated by the MiWaters system.



Relates To	Permit Number	Permit Type	Agency Contact	Issue Date	Expiration Date	Permit Status
Battery Solutions LLC	NEC157128 v2.0	NPDES: NPDES Industrial Storm Water No Exposure Certificate (NEC)				Not Issued
Battery Solutions LLC	NEC157128 v1.0	NPDES: NPDES Industrial Storm Water No Exposure Certificate (NEC)		10/25/2011	10/25/2016	Expired
Battery Solutions LLC	NEC186709 v1.0	NPDES: NPDES Industrial Storm Water No Exposure Certificate (NEC)	Laura Mathews mathewsl2@michigan.gov (517) 388-3404	02/19/2018	02/18/2023	In Effect
Battery Solutions LLC-Holtz Drive	NEC186792 v1.0	NPDES: NPDES Industrial Storm Water No Exposure Certificate (NEC)	Ryan Schwarb schwarbr@michigan.gov (248) 508-1123	11/06/2018	11/06/2023	In Effect



Douglas A. Ducey  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera  
Director

November 30, 2016

## Certifier

BRIAN GALLENTINE  
BATTERY SOLUTIONS LLC  
5900 BRIGHTON PINES COURT  
HOWELL, MI 48843

## NO EXPOSURE CERTIFICATION

**CERT #: AZRNED-1213**

**Effective Date: November 30, 2016**

Dear Applicant:

The Arizona Department of Environmental Quality received your No Exposure Certification form on November 30, 2016, indicating the facility identified below meets the conditions of "No Exposure Exclusion" as defined in 40 CFR 122.26(g) and incorporated into the Arizona Administrative Code at R18-9A905(A)(1)(d).

If your facility continues to meet the conditions of "No Exposure Exclusion," you will need to submit a No Exposure Certification form once every five years. If you determine that your facility no longer meets the conditions of "No Exposure Exclusion," you must apply for coverage under either an individual AZPDES stormwater permit or the Multi-Sector General Permit for stormwater discharges from industrial activities.

Note: The No Exposure Certification does not necessarily mean you do not need other permits. Check with the appropriate city or county for more information.

If you have any questions regarding this letter, please contact Joanie Rhyner at the Stormwater Notice of Intent Processing Center, (602) 771-7614. If you have specific questions about the No Exposure Certification or how to obtain coverage under the Multi-Sector General Permit, please contact Chris Henninger at (602) 771-4508.

### Facility Information:

BATTERY SOLUTIONS LLC  
618 E AUTO CENTER DRIVE, SUITE 111  
MESA, AZ 85204  
Lat: 33°38'31.79" Long: 111°81'71.43"  
Email: bgallentine@batterysolutions.com  
Phone: 248-446-3001

If I can be of further service, please contact me anytime.

**Sondra M. Francis, Hydrologist A.S., Business B.S.**

[francis.sondra@azdeq.gov](mailto:francis.sondra@azdeq.gov)

ADEQ

Stormwater and General Permits Unit  
1110 West Washington Street, 5415A-1  
Phoenix, AZ 85007  
Phone: 602-771-4666

**Exp 11/30/2021**

#### Main Office

1110 W. Washington Street • Phoenix, AZ 85007  
(602) 771-2300

#### Southern Regional Office

400 W. Congress Street • Suite 433 • Tucson, AZ 85701  
(520) 628-6733

[www.azdeq.gov](http://www.azdeq.gov)

printed on recycled paper

**Mesa Fire and Medical Department**

Fire Prevention Division

PO Box 1466

Mesa, AZ 85211-1466



Account No:

**FIR18-06089**

Valid From:

**02/2019**

Valid To:

**02/2020**

# Fire Safety Operational Permit

This permit is subject to the provisions of Title 7 (Fire Regulations) of the Mesa City Code.

The granting of this permit shall not be construed as an expressed or implied certification that the premises upon which you are conducting business activities within the City of Mesa conform to applicable City codes.

Nonconformance to City codes could result in cancellation of this permit or citation.

**POST THIS PERMIT IN A CONSPICUOUS PLACE**

Business Name: BATTERY SOLUTIONS LLC

Permit Address: 618 E AUTO CENTER DR STE 111  
MESA, AZ 85204

A handwritten signature in blue ink, appearing to read 'Mary Cameli', with a stylized flourish at the end.

Issued by: Mary Cameli  
Fire Chief





ENVIRONMENTAL & SUSTAINABILITY MS-9950  
55 N Center St  
PO Box 1466  
Mesa, Arizona 85211-1466

September 13, 2018

Mr. Scott Sidum  
Battery Solutions  
618 E. Auto Center Drive, 111  
Mesa, AZ 85204-5204

Dear Mr. Sidum,

On September 13, 2018 the City of Mesa's Environmental and Sustainability Division (ESD) conducted an inspection of your facility, located at 618 E. Auto Center Drive #111, to evaluate your facility for compliance with the City's Particulate Pollution Sources Ordinance (Title 8, Chapter 2, Article 1) and the City's Storm Water Pollution Control Ordinance (Title 8, Chapter 5).

Based on the results of that inspection, the City has determined that your facility's operations are in compliance with these ordinances. Information pertaining to the most recent inspection was provided to you or your company representative at the time of inspection, but is also attached for verification.

**Please note that the City is not making a determination of compliance with federal, state, or county regulations.**

Please contact the ESD inspector per the information below if you have any questions about this inspection, previous inspections, or the City's industrial inspection process.

Sincerely,

Michael Baez  
Environmental Technician  
480-644-3520  
Michael.baez@mesaaz.gov

Enclosure



# City of Mesa Environmental Compliance Review Form

Property/Project Owner: BATTERY SOLUTIONS

Site Location/Address: 618 E AUTO CENTER DR.

Business/Project Name: \_\_\_\_\_

Project Size (acres): \_\_\_\_\_ Record #: ENV18-04168 SIC Code: 5093

Date of Inspection:

9/13/18

Type of Site:

Industrial



Commercial



Residential



Inspection Type:	Private Construction <input type="checkbox"/>	City Construction <input type="checkbox"/>	Routine Industrial <input checked="" type="checkbox"/>	Complaint <input type="checkbox"/>
Air Quality Permit Required?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Permit #:	_____
Stormwater Permit Required?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Authorization #:	<u>AZRND-1213 (NEC) 9/30/16</u>
Issue(s) Identified:	Imminent Hazard <input type="checkbox"/>	Hazard <input type="checkbox"/>	Minor Issue <input type="checkbox"/>	Other Issue <input type="checkbox"/>
Inspection Details/Comments: <ul style="list-style-type: none"><li>• LARGE QUANTITY HANDFUL OF UNID. WASTE</li><li>• BATTERY RECYCLING SORTING FACILITY</li><li>• ALL DRY MATERIAL, IN BOXES OR 55 GAL DRUMS</li><li>• NO MATERIAL/WASTE EXPOSED TO STORMWATER (ALL COVERED)</li><li>• NO CITY STORMWATER SEWAL SYSTEM CATCH BASIN PRESENT.</li></ul>				
Corrective Actions Needed:		Corrective Actions Taken:		
<u>N/A</u>		<u>-</u>		
Follow-Up Inspection Required?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Follow-Up Inspection Date:	____/____/____

Please address the conditions identified above before the indicated follow-up inspection date. Contact your site inspector directly for assistance. The Environmental & Sustainability Division can be reached at (480) 644-3599, and the fax number is (480) 644-4774.

Status:

No Violation



In Violation



Citation Issued



3<sup>rd</sup> Party Abatement



Criminal Action



Point of Contact

City of Mesa Inspector

PRINT: Scott Sidum

PRINT: MICHAEL BAEZ

SIGN: [Signature]


SIGN: [Signature]

PHONE #: ( ) -

PHONE #: (480) 644 - 3520

EMAIL: \_\_\_\_\_


EMAIL: michael.baez@mesaaz.gov

	<b>QEH&amp;SMS Manual</b>	<b>Effective Date: 3/15/2019</b>
<b>SUBJECT:</b> <b>Quality, Environmental, Health and Safety Management System Manual</b>		<b>Issue: 11.0</b> <b>Page: 1 of 37</b>




# **Quality, Environmental, Health and Safety (QEH&S) Management System Manual**



	<b>QEH&amp;SMS Manual</b>	<b>Effective Date: 3/15/2019</b>
<b>SUBJECT:</b> <b>Quality, Environmental, Health and Safety Management System Manual</b>		<b>Issue: 11.0</b> <b>Page: 2 of 37</b>

## TABLE OF CONTENTS

<b>INTRODUCTION .....</b>	<b>4</b>
REFERENCE DOCUMENTS .....	4
DEFINITIONS .....	4
<b>1 GENERAL REQUIREMENTS (RIOS 1.1, R2 1.0) .....</b>	<b>5</b>
1.1 SCOPE AND APPLICATION (RIOS 1.1, R2 1.0) .....	5
1.1.1 RIOS OUTCOMES (RIOS 1.1.1) .....	6
1.2 QEH&S INFRASTRUCTURE (RIOS 1.2, R2 1.0) .....	6
1.2.1 MANAGEMENT STRUCTURE (RIOS 1.2.1) .....	6
1.2.2 RESOURCES (RIOS 1.2.2) .....	7
1.2.3 SENIOR MANAGEMENT (RIOS 1.2.3) .....	8
1.3 DOCUMENT AND RECORDKEEPING CONTROLS (RIOS 1.3, R2 13.0) .....	8
1.3.1 CONTROL OF DOCUMENTS (RIOS 1.3.1, R2 13.0) .....	9
1.3.2 CONTROL OF RECORDS (RIOS 1.3.2, R2 13.0) .....	9
<b>2 POLICY (RIOS 2.0, R2 1.0) .....</b>	<b>10</b>
<b>3 PLANNING (RIOS 3.0, R2 1.0) .....</b>	<b>11</b>
3.1 IDENTIFYING THE RIOS FOOTPRINT (RIOS 3.1, R2 1.0) .....	11
3.1.1 IMPORTANT QUALITY RISKS (RIOS 3.1.1) .....	11
3.1.2 IMPORTANT ENVIRONMENTAL IMPACTS (RIOS 3.1.2) .....	12
3.1.3 IMPORTANT HEALTH & SAFETY RISKS (RIOS 3.1.3) .....	12
3.1.4 LEGAL REQUIREMENTS (RIOS 3.1.4) .....	13
3.1.5 PRODUCT, SERVICE AND CUSTOMER REQUIREMENTS (RIOS 3.1.5) .....	13
3.1.6 OTHER STAKEHOLDER REQUIREMENTS (RIOS 3.1.6) .....	14
3.2 IMPROVEMENT PLANNING (RIOS 3.2, R2 1.0) .....	15
3.2.1 ESTABLISHING GOALS (RIOS 3.2.1) .....	15
3.2.2 PLANS FOR GOAL ACHIEVEMENT (RIOS 3.2.2) .....	16
3.3 CHANGE MANAGEMENT (RIOS 3.3, R2 1.0) .....	16
<b>4 IMPLEMENTATION (RIOS 4.0, R2 1.0) .....</b>	<b>17</b>
4.1 RECYCLER KNOWLEDGE (RIOS 4.1, R2 1.0) .....	17
4.1.1 COMPETENCE (RIOS 4.1.1) .....	17
4.1.2 AWARENESS (RIOS 4.1.2) .....	18
4.2 COMMUNICATION (RIOS 4.2, R2 1.0) .....	18
4.2.1 INTERNAL COMMUNICATION (RIOS 4.2.1) .....	18
4.2.2 CUSTOMER COMMUNICATION (RIOS 4.2.2) .....	19
4.2.3 SUPPLIER COMMUNICATION (RIOS 4.2.3) .....	19
4.2.4 OUTSIDE PROVIDER COMMUNICATION (RIOS 4.2.4) .....	19
4.2.5 EXTERNAL COMMUNICATION (RIOS 4.2.5) .....	20
4.3 OPERATIONAL CONTROL (RIOS 4.3, R2 1.0) .....	20
4.3.1 SOURCE MATERIAL (RIOS 4.3.1) .....	21
4.3.2 OUTSOURCED PROVIDERS, PRODUCTS AND SERVICES (RIOS 4.3.2) .....	22
4.4 QUALITY CONTROLS (RIOS 4.4) .....	22

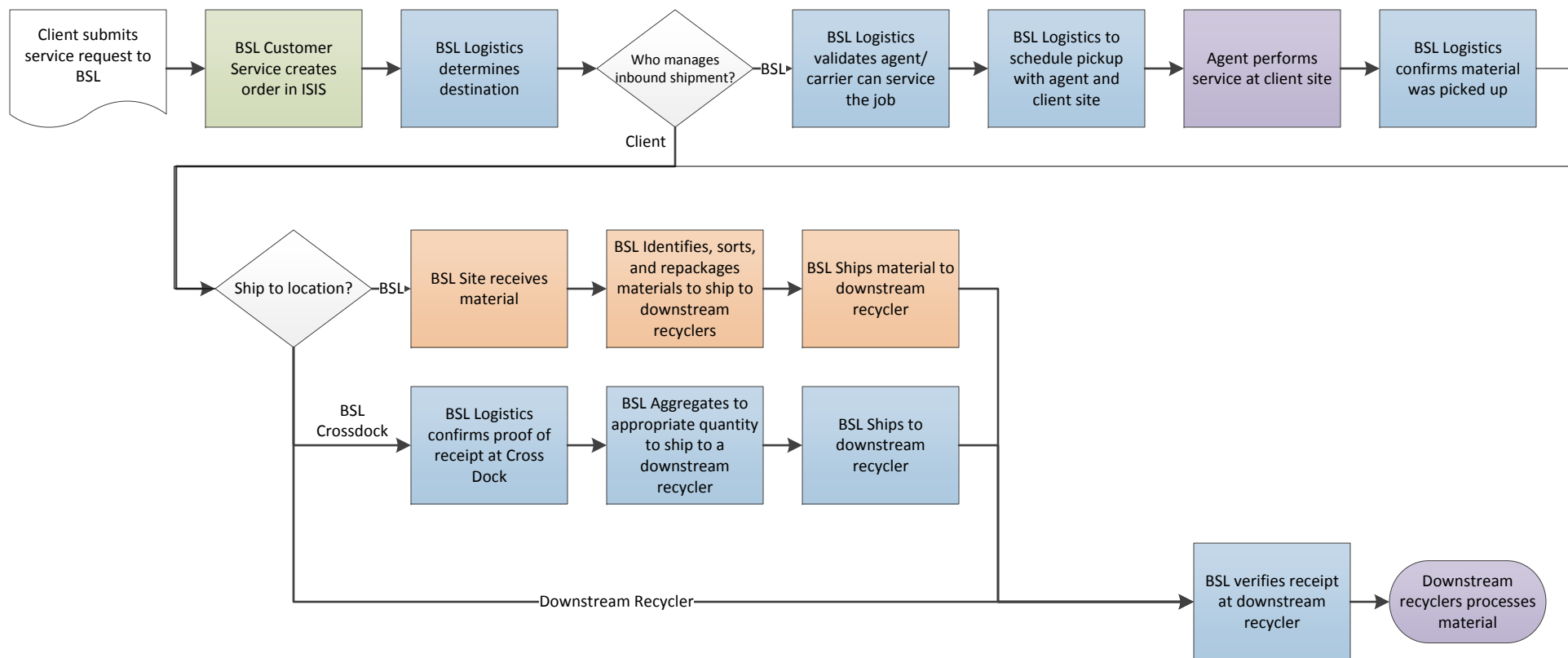
	<b>QEH&amp;SMS Manual</b>	<b>Effective Date: 3/15/2019</b>
<b>SUBJECT:</b> <b>Quality, Environmental, Health and Safety Management System Manual</b>		<b>Issue: 11.0</b> <b>Page: 3 of 37</b>

4.5	ENVIRONMENTAL CONTROLS (RIOS 4.5) .....	23
4.6	HEALTH AND SAFETY CONTROLS (RIOS 4.6, R2 4.0) .....	23
4.7	EMERGENCY PREPAREDNESS AND RESPONSE (RIOS 4.7, R2 1.0) .....	26
4.8	HIERARCHY OF RESPONSIBLE MANAGEMENT STRATEGIES (R2 2.0) .....	26
4.9	FOCUS MATERIALS MANAGEMENT AND ACCOUNTABILITY FOR DOWNSTREAM RECYCLING CHAIN (R2 5.0) .	27
4.10	REUSABLE EQUIPMENT AND COMPONENTS (R2 6.0) .....	27
4.11	TRACKING THROUGHPUT (R2 7.0) .....	28
4.12	DATA DESTRUCTION (R2 8.0) .....	28
4.13	STORAGE (R2 9.0) .....	29
4.14	SECURITY (R2 10.0) .....	29
4.15	INSURANCE, CLOSURE PLAN AND FINANCIAL RESPONSIBILITY (R2 11.0) .....	30
4.16	TRANSPORT (R2 12.0) .....	31
<b>5</b>	<b>CHECKING AND CORRECTIVE ACTION (RIOS 5.0, R2 1.0) .....</b>	<b>31</b>
5.1	MONITORING AND MEASUREMENT (RIOS 5.1, R1 1.0) .....	31
5.1.1	ACTIVITIES REQUIRING MONITORING OR MEASUREMENT (RIOS 5.1.1) .....	32
5.1.2	QEH&S COMPLIANCE (RIOS 5.1.2) .....	32
5.1.3	MAINTENANCE AND CALIBRATION OF MONITORING EQUIPMENT (RIOS 5.1.3) .....	33
5.1.4	ANALYSIS OF MONITORING AND MEASUREMENT RESULTS (RIOS 5.1.4) .....	33
5.2	NONCONFORMANCE AND CORRECTIVE ACTION (RIOS 5.2, R2 1.0) .....	33
5.2.1	CONTROL OF NONCONFORMING PRODUCT (RIOS 5.2.1) .....	34
5.2.2	EH&S INCIDENT INVESTIGATIONS (RIOS 5.2.2) .....	34
5.2.3	NONCONFORMITY, CORRECTIVE ACTION AND PREVENTIVE ACTION (RIOS 5.2.3) .....	35
5.3	INTERNAL RIOS AUDITS (RIOS 5.3, R2 1.0) .....	35
<b>6</b>	<b>MANAGEMENT REVIEW (RIOS 6.0, R2 1.0) .....</b>	<b>36</b>
<b>7</b>	<b>REVISION HISTORY .....</b>	<b>37</b>



# Battery Solutions Process Flow

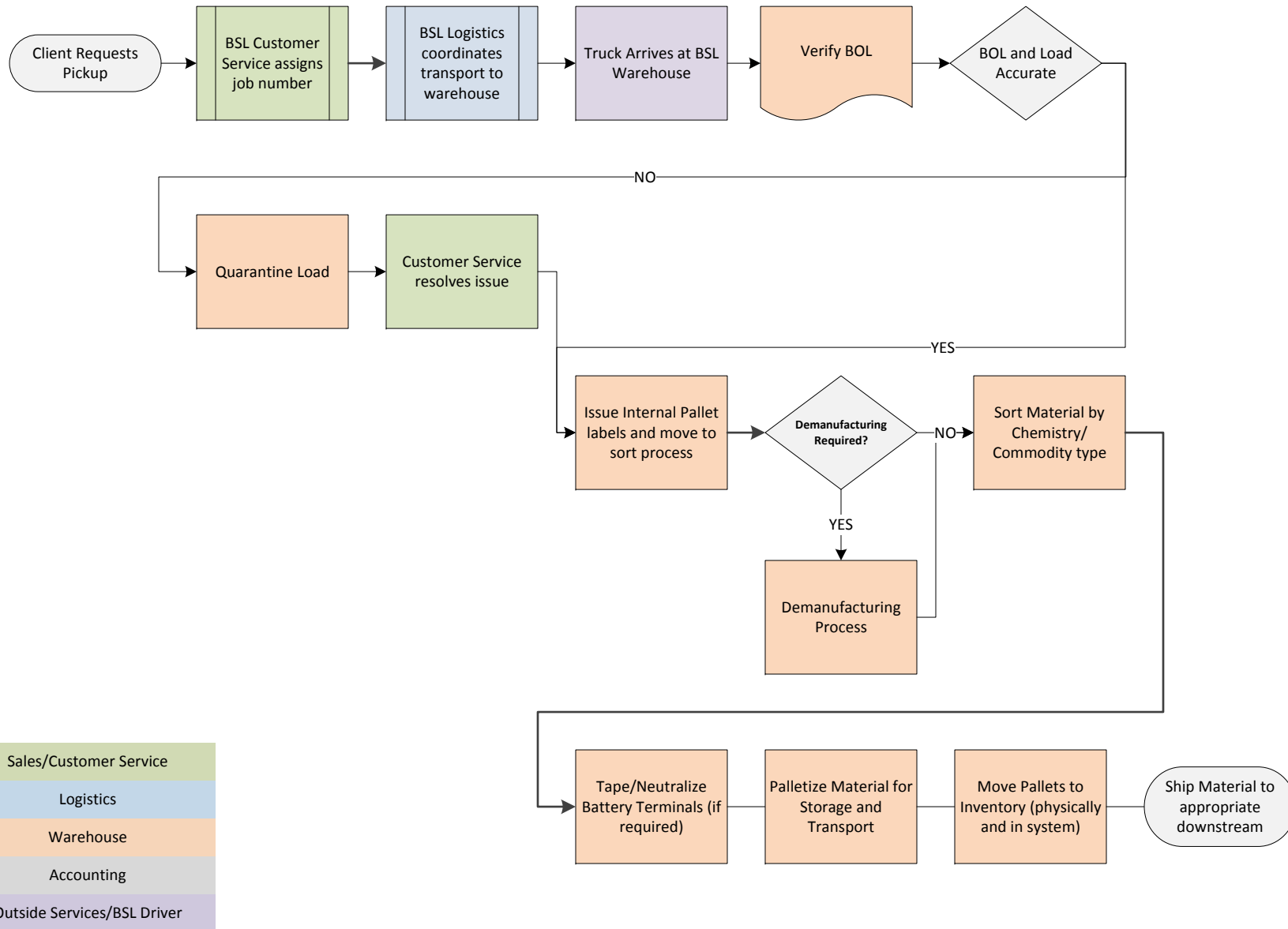
## Material Chain of Custody




Sales/Customer Service
Logistics
Warehouse
Accounting
Outside Services/BSL Driver

# Battery Solutions Process Flow

## Site Material Handling Process



		<b>SOP #</b>	13172
		<b>Revision #</b>	6.0
		<b>Implementation Date</b>	7/31/2013
<b>Page #</b>	1	<b>Last Reviewed/Update Date</b>	3/15/2019
<b>SOP Owner</b>	EHS	<b>Approval</b>	TE

## Focus Material (FM) Management Plan

### 1. Purpose

This document defines how Focus Material (FM) passing through Battery Solutions, LLC (BSL) facilities or controls are managed in a manner to protect worker health and safety, public health, and the environment.

### 2. Scope

This procedure applies to all BSL and BSL Downstream Partners activities and services that may result in the handling FM.

### 3. Responsibilities

Director of Environmental, Health, & Safety (or designate), and the site Management Representatives are responsible for ensuring adherence to this SOP.


### 4. Definitions

4.1 Downstream vendors include any entity to which a recycler transfers used or end-of-life electronic equipment, components, or materials including reuse, refurbishing, de-manufacturing, processing, materials recovery, energy recovery, incineration, and disposal facilities.

4.2 Batteries, computer equipment, and Universal Waste, also referred to as "equipment, constituents, and components", include all types of batteries, power storage and transfer equipment, ancillary mobile, stationary, and peripheral primary and secondary power systems. It furthermore includes any other or new (future) types of equipment that is designed primarily to store or convey provide and maintain primary, secondary, and tertiary power, and any new accessories to such equipment.

4.3 Key Functions are the originally intended functions of a unit of equipment or component, or a subset thereof that will satisfactorily serve the purpose(s) of someone who will reuse the unit, if applicable.

4.4 Focus Materials, which may also be referred to as "FMs" or "Universal Waste", are materials originating from or peripheral to end-of-life electronic equipment that warrant greater care during recycling, refurbishing, materials recovery, energy recovery, incineration, and/or disposal due to their toxicity or other potential adverse worker health and safety, public health, or environmental

		<b>SOP #</b>	13172
		<b>Revision #</b>	6.0
		<b>Implementation Date</b>	7/31/2013
<b>Page #</b>	2	<b>Last Reviewed/Update Date</b>	3/15/2019
<b>SOP Owner</b>	EHS	<b>Approval</b>	TE

effects that can arise if the materials are managed without appropriate safeguards.

The following are R2 Focus Materials:

- (1) Items containing polychlorinated biphenyls (PCBs)
- (2) Items containing mercury
- (3) CRT Monitors
- (4) Batteries

Whole and shredded circuit boards, except for whole and shredded circuit boards that do not contain lead solder, and have undergone safe and effective mechanical processing, or manual dismantling, to remove mercury and batteries. Equipment, components, or materials (whole or shredded) that have undergone safe and effective mechanical processing or manual dismantling to remove FMs, yet still retain de-minimal amounts of FMs, are not subject to the R2 requirements that are triggered by the presence of FMs.

4.5 Recycling Chain refers to all the downstream vendors that handle end-of-life equipment, components, or materials that pass through an R2 electronics (or constituent components or peripherals originating from electronics) recycler's facility or control. It includes, but does not extend beyond materials recovery facilities such as smelters. Recyclers include but need not be limited to resellers, re-furbishers, recyclers, de-manufacturers, asset re-coverers, brokers, as well as power service companies that engage in these activities.

## **5. Procedure**

---

### **5.1 Removal of FMs**

5.1.1 Prior to shredding, materials recovery, energy recovery, incineration, or land disposal of equipment or components, FMs (as well as toner and toner cartridges) shall be removed using safe and effective mechanical processing or manual dismantling, with two exceptions:

5.1.1.1 Items containing mercury if they are too small to remove safely at reasonable cost, and workers are protected from the risks posed by the mercury during and subsequent to any processing or manual dismantling of the equipment containing it, and the equipment and components containing such items are sent to materials recovery facilities that are properly licensed to receive, and that utilize technology designed to safely and

		<b>SOP #</b>	13172
		<b>Revision #</b>	6.0
		<b>Implementation Date</b>	7/31/2013
<b>Page #</b>	3	<b>Last Reviewed/Update Date</b>	3/15/2019
<b>SOP Owner</b>	EHS	<b>Approval</b>	TE

effectively manage, equipment or components containing such mercury-containing items.

5.1.1.2 Power management equipment, batteries, and circuit boards contained in equipment or components destined for materials recovery need not be removed prior to shredding and/or materials recovery if the shredding and/or materials recovery occurs in facilities that are properly licensed to receive, and that utilize technology designed to safely and effectively manage, equipment or components containing these FMs.

## 5.2 Processing, Recovery, and Treatment of FMs

5.2.1 BSL shall send removed FMs to processing, recovery, or treatment facilities that are properly licensed to receive, and that utilize technology designed to safely and effectively manage, the FMs. This shall include:


- (1) Items containing mercury – mercury retorting
- (2) Circuit boards – removal of batteries and mercury and then smelting for metals recovery
- (3) PCB containing items– ensure the use of a technology specifically designed for PCB destruction that is licensed under the Toxic Substances Control Act and/or other applicable law.
- (4) CRT Monitor recycling, specifically competent panel glass recovery methodologies in compliance with regulatory standards
- (5) Toner and toner cartridges shall be recycled through an OEM or other qualified toner recycler.

## 5.3 Selection and Ongoing Due Diligence of Downstream Vendors for FMs

5.3.1 For shipments of removed FMs, and shipments of equipment and components containing FMs, BSL shall select downstream vendors that possess and conform to:

- (1) Managing FMs in accordance with this SOP
- (2) A documented environmental, health, and safety management system or evidence of a similar system.
- (3) A list of its environmental permits and copies of each (when permissible for release)
- (4) Comply with SOP-13054, “Downstream Processor Due Diligence Procedure” concerning the export of material
- (5) Maintain the following for at least three years: commercial contracts, bills of lading, or other commercially-accepted



		<b>SOP #</b>	13172
		<b>Revision #</b>	6.0
		<b>Implementation Date</b>	7/31/2013
<b>Page #</b>	4	<b>Last Reviewed/Update Date</b>	3/15/2019
<b>SOP Owner</b>	EHS	<b>Approval</b>	TE

documentation for all transfers of equipment, components, and materials into and out of its facility, as well as for any brokering transactions.

- (6) Comply with Section 5 (e) (1-7) of R2, thereby establishing that each vendor in the recycling chain conforms to Section 5 (e) (1-7) of R2.

5.3.2 BSL shall confirm, through audits or other similarly effective means that each downstream vendor in the Recycling Chain to which this SOP applies continues to conform to the requirements of this SOP for as long as it receives FMs directly or indirectly from BSL.

## **6. Related Documents**

---


Document Number	Description
P-13135	QEHS Policy
F-13025	Approved Downstream List Downstream Partner Status
F-13077	BSL-DS Downstream Audit Form
F-13001	BSL-DS Pre-Audit Desk Audit Questionnaire
F-19002	R2 Addendum

## **7. References**

---

RIOS:2016 Recycling Industry Operating Standard

R2:2013 Responsible Recycling Practices

		<b>SOP #</b>	13172
		<b>Revision #</b>	6.0
		<b>Implementation Date</b>	7/31/2013
<b>Page #</b>	5	<b>Last Reviewed/Update Date</b>	3/15/2019
<b>SOP Owner</b>	EHS	<b>Approval</b>	TE

### Revision History

<b>Revision</b>	<b>Description of change</b>	<b>Approved By</b>	<b>Date</b>
1.0	New	D. Chacko	7/31/2013
2.0	Update to remove Zero Landfill Policy reference; add CRT as a FM	D.Chacko	08/04/2014
3.0	Revise compliance requirements regarding documented systems	B. Gallentine	B. Gallentine
4.0	Updated Logo	S. Messing	3/17/16
5.0	Updated with RIOS:2016 numbering	T. Edwards	1/12/17
6.0	Added R2 Addendum	T Edwards	3/15/2019



# Certificate of Registration

This certifies

## Battery Solutions, LLC

4930 Holtz Drive  
Wixom, Michigan, 48393, United States

has been assessed by NSF-ISR and found to be in conformance to the following standard(s):

### Responsible Recycling® (R2):2013

*as applied by the R2 code of practices*

*The organization has been audited by a certification body that is in conformance with ISO/IEC 17021 requirements and applicable ANAB requirements*

#### Scope of Registration:

Collection, identification, packaging and recycling process management of spent batteries and associated equipment.



Certificate Number: C0327625-R23  
Certificate Issue Date: 18-APR-2019  
Registration Date: 10-SEP-2017  
Expiration Date \*: 09-SEP-2020

  
Carl Blazik,  
Director, Technical  
Operations & Business Units,  
NSF-ISR, Ltd.

Page 1 of 2

#### NSF International Strategic Registrations

789 North Dixboro Road, Ann Arbor, Michigan 48105 | (888) NSF-9000 | [www.nsf-isr.org](http://www.nsf-isr.org)



**ANNEX PAGE FOR CERTIFICATE REGISTRATION NUMBER**

**C0327625-R23**

**CERTIFICATE ISSUE DATE: 18-APR-2019**

**CERTIFICATE EXPIRATION DATE: 09-SEP-2020**

Battery Solutions, LLC  
4930 Holtz Drive  
Wixom, Michigan, 48393, United States

<b>Remote Location:</b>  Battery Solutions, LLC 618 E. Auto Center Drive Suite 111 Mesa, Arizona, 85204, United States	<b>Scope:</b> Responsible collection, identification, packaging and recycling process management of spent batteries and associated equipment.
---	---

**NSF International Strategic Registrations**

789 North Dixboro Road, Ann Arbor, Michigan 48105 | (888) NSF-9000 | [www.nsf-isr.org](http://www.nsf-isr.org)

**This Annex is only Valid in connection with the above-mentioned certificate issued by NSF-ISR**



# *Certificate of Registration*

This certifies

## **Battery Solutions, LLC**

4930 Holtz Drive  
Wixom, Michigan, 48393, United States

has been assessed by NSF-ISR and found to be in conformance to the following standard(s):

### **RIOS:2016**


*The organization has been audited by a certification body that is in conformance with ISO/IEC 17021 requirements and applicable ANAB requirements*

#### **Scope of Registration:**

Collection, identification, packaging and recycling process management of spent batteries and associated equipment.



Certificate Number:	C0327625-RI6
Certificate Issue Date:	04-SEP-2019
Registration Date:	01-OCT-2019
Expiration Date *:	30-SEP-2022

  
Tom Chestnut,  
Sr Vice President - ISR,  
NSF-ISR, Ltd.

Page 1 of 2

### **NSF International Strategic Registrations**

789 North Dixboro Road, Ann Arbor, Michigan 48105 | (888) NSF-9000 | [www.nsf-isr.org](http://www.nsf-isr.org)





**ANNEX PAGE FOR CERTIFICATE REGISTRATION NUMBER  
C0327625-RI6**

**CERTIFICATE ISSUE DATE: 04-SEP-2019  
CERTIFICATE EXPIRATION DATE: 30-SEP-2022**

Battery Solutions, LLC  
4930 Holtz Drive  
Wixom, Michigan, 48393, United States

<b>Remote Location:</b>  Battery Solutions, LLC 618 E. Auto Center Drive Suite 111 Mesa, Arizona, 85204, United States	<b>Scope:</b> Responsible collection, identification, packaging and recycling process management of spent batteries and associated equipment.
---	---

**NSF International Strategic Registrations**

789 North Dixboro Road, Ann Arbor, Michigan 48105 | (888) NSF-9000 | [www.nsf-isr.org](http://www.nsf-isr.org)

**This Annex is only Valid in connection with the above-mentioned certificate issued by NSF-ISR**

**CHWMEG, Inc.**[www.chwmeg.org](http://www.chwmeg.org)

Worldwide Headquarters • 470 William Pitt Way • Pittsburgh, PA 15238 USA  
Tel +1 (412) 826-3055 • Fax +1 (586) 461-1856 • [administrator@chwmeg.org](mailto:administrator@chwmeg.org)

Asia-Pacific Support • Singapore Land Tower  
37th Floor, 50 Raffles Place • Singapore 048623  
Tel +65 9237 8445 • Fax +65 6829 7070 • [asia-pacific@chwmeg.org](mailto:asia-pacific@chwmeg.org)

Europe/Africa/Middle East Support • Warsaw Financial Centre - 11th Floor  
Emilii Plater 53 • 00-113 Warsaw Poland  
Tel +48 60 733 9012 • Fax +48 22 528 6701 • [europe@chwmeg.org](mailto:europe@chwmeg.org)



September 3, 2019

Mr. Tom Edwards  
Manager, Quality, EHS  
Battery Solutions LLC  
4930 Holtz Drive  
Wixom MI 48393

RE: Recent CHWMEG, Inc. Facility Review Conducted at Battery Solutions LLC

Dear Mr. Edwards:

On behalf of CHWMEG, Inc.'s (CHWMEG) over 280 member enterprises, representing over 800 individual companies, I want to extend appreciation to you and the other staff at your facility for your support of the CHWMEG 2019 Facility Review Program (FRP) review recently completed at your facility. The member companies recognize and appreciate the level of effort required to support the facility review (see enclosed Membership List).

Your efforts enabled the interested CHWMEG member companies, which represent customers or potential customers of your facility, the benefit of receiving the information necessary for their individual contractor/vendor management programs. Further, your support of the CHWMEG process reduces the need to support multiple customer reviews from these individual companies.

CHWMEG continuously strives to improve its practices and procedures. CHWMEG's goals include streamlining the facility review processes and reducing costs. It is hoped that CHWMEG's efforts also benefit the reviewed facility. At your convenience, please complete the enclosed survey, and return it using the enclosed self-addressed, stamped envelope or by fax to +1 (586) 461-1856. Members of CHWMEG will review your feedback.

Also, please find enclosed a plaque recognizing the efforts of you and your colleagues in supporting the 2019 CHWMEG FRP review of your facility. You are encouraged to display this as you deem appropriate.

If you have any questions regarding the CHWMEG program, or wish to refer any of your customers or potential customers to CHWMEG, please contact Jeff Sacre, CHWMEG Administrator, at +1 (412) 826-3056 or via email at [jeff\\_sacre@chwmegeg.org](mailto:jeff_sacre@chwmegeg.org). You can also contact CHWMEG's Asia-Pacific Director, Mr. David Chng, at +65 9237 8445 (email: [asia-pacific@chwmegeg.org](mailto:asia-pacific@chwmegeg.org)) or European Director, Mr. Randy Mott, at +48 607 339 012 (email: [europe@chwmegeg.org](mailto:europe@chwmegeg.org)).

Information about CHWMEG is always available on the internet at <http://www.chwmegeg.org>.

Thank you again for your support and feedback.

Sincerely,

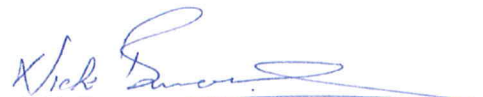
**The 2019 CHWMEG, Inc. Board of Directors**



Kevin Bloomer  
CHWMEG, Inc. Chair



Michael Cakouros  
CHWMEG, Inc. Vice-Chair



Nick Burrows, Ph.D.  
CHWMEG, Inc. Treasurer



Doug Duncan  
CHWMEG, Inc. Secretary



Jimmy Street  
Board Member-at-Large



Gary Williams  
Board Member-at-Large



Beth Troxler  
Board Member-at-Large


TK et al: jas

encl: CHWMEG, Inc. Membership List  
Feedback Survey with Stamped, Return Envelope  
Appreciation Plaque

cc: Mr. Thomas Bjarnemark - CEO

tel: 248-446-5633 Office / 517-294-6330 cell

email: [tom@batterysolutions.com](mailto:tom@batterysolutions.com)

		<b>SOP #</b>	13054
		<b>Revision #</b>	9.0
		<b>Implementation Date</b>	06/01/13
<b>Page #</b>	1	<b>Last Reviewed/Update Date</b>	2/24/2019
<b>SOP Owner</b>	EHS	<b>Approval</b>	TE

## Downstream Processor Due Diligence Procedure

### **1. Purpose**

Battery Solutions, LLC (BSL) maintains a close relationship with its downstream processors. BSL evaluates and monitors compliance with internal requirements, applicable regulations (including international treaties, federal, state and local regulations), the Recycling Industry Operating Standard (RIOS), and the Responsible Recycling Practices (R2) as applicable. This procedure establishes a comprehensive all-encompassing protocol as a basis for scoping and conducting Quality, Environmental Health and Safety (QEHS) due diligence.

### **2. Scope**

This procedure applies to all departments and personnel, who manage, process, ship or handle end of life batteries, electronic components, universal waste, and electronic scrap.

### **3. Responsibilities**

3.1 BSL Management is responsible for ensuring support for this procedure.

3.2 The VP Operations (or designate) is responsible for conducting downstream due diligence and conformance to this procedure and maintenance of the Approved Downstream Partner List.


3.3 Operations, and Consuming Sales personnel are responsible for shipping materials only to approved downstream partners.

3.4 The VP Operations (or designate) is responsible for conducting internal audits to ensure compliance with this procedure.

### **4. Definitions**

4.1 Collector/Handler — Collects used batteries, separates and transports them to other businesses for recycling.

4.2 Re-furbisher — Repairs or reconditions electronic devices for resale in secondary retail or wholesale markets.

		<b>SOP #</b>	13054
		<b>Revision #</b>	9.0
		<b>Implementation Date</b>	06/01/13
<b>Page #</b>	2	<b>Last Reviewed/Update Date</b>	2/24/2019
<b>SOP Owner</b>	EHS	<b>Approval</b>	TE

4.3 Processor — De-manufactures, mechanically reduces with constituent separation, thermally processes electronic devices and their components to separate and recover the scrap value.

4.4 Recycler – Uses scrap from de-manufactured electronic devices as feedstock to manufacture new products. Under normal circumstances an OEM or after-market factory fits this definition.

4.5 Recycling - A series of activities by which obsolete spent batteries, periphery power equipment, used electronics, and universal wastes are collected, sorted, processed and converted into raw materials and used as feed stock in the manufacturing of new products.

4.6 Disposal - Final disposition of a material or device that provides no beneficial use. Disposal includes landfill and incineration.

4.7 ECHO database -EPA Environmental Compliance History Online

## **5. Procedure**

---

5.1 BSL conducts due diligence assessments that evaluate processor activities to determine the degree of risk and client exposure to legal liabilities, security risks, and environmental stewardship. The protocol established for conducting these assessments may include, but is not limited to the following parameters:

5.1.1 A review to determine adherence to BSL's FM Management Plan and Responsible Recycling (R2) practices.


5.1.2 A documented environmental, health and safety management systems complying with ISO 14001, OHSAS 18001 or RIOS standards or evidence of a similar system.

5.1.3 A review and list of any regulatory permits and the environmental controls associated with the processing of spent batteries, periphery power equipment, used electronics, and universal wastes.

5.1.4 Compliance with Section 5 (e) (1-7) of R2 thereby establishing that each vendor in the recycling chain conforms to Section 5 (e) (1-7) of R2.

5.1.5 Review of processors compliance with Section 6 of R2 regarding refurbishment, testing and adequate packaging of equipment and



		<b>SOP #</b>	13054
		<b>Revision #</b>	9.0
		<b>Implementation Date</b>	06/01/13
<b>Page #</b>	3	<b>Last Reviewed/Update Date</b>	2/24/2019
<b>SOP Owner</b>	EHS	<b>Approval</b>	TE

components going for reuse and review of Section 8 of R2 regarding data destruction.

5.1.6 Review processors compliance with Section 3(a)(2) of R2 regarding legality of all international shipments of equipment, components or materials containing FM(s) including compliance with the International Basel Convention regarding the transboundary movement of hazardous wastes.

5.1.7 Review processors compliance with Section 7 of R2 regarding tracking of material flow.

5.1.8 EPA Environmental Compliance History Online (ECHO) database. ECHO allows access to a facility compliance performance history.

5.1.9 Review of SREA Compliance Report.

5.1.10 Review of any available state compliance performance database.

5.1.11 A review of previous facility compliance audit reports from federal and/or state regulatory officials or other third party auditors.

5.1.12 A review of available Phase I and Phase II Environmental Site Assessment reports.

5.1.13 Insurance policies and their levels of coverage; request that BSL is named as an additional insured.

5.1.14 Review of facility closure plan and financial assurance mechanism


5.1.15 Hazardous materials transportation procedures.

5.1.16 Facility security measures and protocol.

5.1.17 Evaluation of social responsibility issues such as child, immigrant, or prison labor practices.

5.1.18 A review of contractual controls and obligations between BSL and partner.

5.1.19 A review of contractual controls and obligations in place for partner's secondary downstream processors.

		<b>SOP #</b>	13054
		<b>Revision #</b>	9.0
		<b>Implementation Date</b>	06/01/13
<b>Page #</b>	4	<b>Last Reviewed/Update Date</b>	2/24/2019
<b>SOP Owner</b>	EHS	<b>Approval</b>	TE

5.1.20 A review of any company bankruptcy proceedings.

5.1.21 A review of any civil or criminal actions brought against the company or any of its officers.

5.1.22 Review of chemical management methods

5.1.23 A review of housekeeping practices

5.1.24 A review of any awards presented to the organization by government or private groups for environmental achievements

5.2 The above protocol is not designed to fit or apply to all organizations. The protocol above is not designed to be all encompassing, but defines what could be applicable to a given organization. The scope of the actual protocol for a given facility is based on the specific organization being evaluated and whether it is an initial or surveillance audit.

5.3 Potential downstream partners may complete pre-screening/desk audit F-13001 ( if utilizing a Consultant, their forms may be substituted )

5.4 VP Operations (or designate ) may schedule and conduct a site audit as appropriate. Audit findings will be documented. Checklist. This form and additional documentation provided during the audit (i.e. permits, etc.) shall be maintained by the EHS department. In the case of viewing documents only due to security concerns it will be documented.

5.4.1 The use of third party contractors to perform audits is acceptable

5.5 The release of a Downstream Audit Checklist will be provided to a third party only after the person requesting the report agrees to the following conditions:

- That the audit report is private, confidential and shall not be released to any third party outside the requester's organization unless a court order requires it.
- The requesting party must safeguard the information in the audit report from theft or unauthorized access.
- The requesting party acknowledges that the accuracy of the findings in the report were valid only at the time of the on-site audit.

5.6 Surveillance audits will be conducted as directed by the VP Operations (or designate) and identify whether any of the following conditions have occurred:



		<b>SOP #</b>	13054
		<b>Revision #</b>	9.0
		<b>Implementation Date</b>	06/01/13
<b>Page #</b>	5	<b>Last Reviewed/Update Date</b>	2/24/2019
<b>SOP Owner</b>	EHS	<b>Approval</b>	TE

- Any changes to the downstream movement of universal waste, used batteries, peripheral equipment, or their components.
- Changes in company ownership.
- Regulatory citations or consent orders received by the company.
- Inspections conducted by regulatory agencies.
- Certifications obtained or relinquished.
- Any changes in a process that included the installation of pollution control devices.
- Expansion of their recycling capabilities.
- Any changes to insurance coverage.
- Any change in address or new facilities that have been added to the company since the last audit.
- Changes in hazardous waste generation status or permits.

5.7 The VP Operations (or designate) will review and maintain the Approved Downstream Partner List on a quarterly basis, or more frequently if needed.

## **6. Related Documents (including Forms and Records)**

Document Number	Description
F-13025	Approved Downstream Vendor List
F-13001	BSL-DS Pre-Audit/Desk Audit Questionnaire
F-13077	BSL-DS Audit Form
F-19002	BSL R2 Addendum
SOP-13172	FM Management Plan

## **7. References**

RIOS:2016 Recycling Industry Operating Standard

R2:2013 Responsible Recycling Practices

# OSHA's Form 300A (Rev. 01/2004)

*All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete.*

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

*Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.*

### Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	0	1	5
(G)	(H)	(I)	(J)

## Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
0	1
(K)	(L)

## Injury and Illness Types

Total number of... (M)			
(1) Injury	<u>6</u>	(4) Poisoning	<u>0</u>
(2) Skin Disorder	<u>0</u>	(5) Hearing Loss	<u>0</u>
(3) Respiratory Condition	0	(6) All Other Illnesses	0

**Post this Summary page from February 1 to April 30 of the year following the year covered by the form.**

Public reporting burden for this collection of information is estimated to average 58 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave. NW, Washington, DC 20210. Do not send the completed forms to this office.

Year 2018



**U.S. Department of Labor**  
**Occupational Safety and Health Administration**  
Form approved OMB no. 1218-0176

### Establishment information

Your establishment name Battery Solutions LLC

Street 5900 Brighton Pines Court - Corp. Office

City Howell State MI Zip 48843

Industry description (e.g., Manufacture of motor truck trailers)  
Warehouse and Office for Battery Recycling

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)  
5 0 9 3

OR North American Industrial Classification (NAICS), if known (e.g., 336212)

### Employment information

Annual average number of employees	<u>80</u>
Total hours worked by all employees last year	101,998

**Sign here**

Thomas Bjørn

**Knowingly falsifying this document may result in a fine**

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Thomas Bjarnemark  
Company executive

248-446-3001  
Phone

CEO  
Title

1/9/2019

Date \_\_\_\_\_

# OSHA's Form 300A (Rev. 01/2004)

## Summary of Work-Related Injuries and Illnesses

Year 2018



U.S. Department of Labor  
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

### Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>0</u>	<u>1</u>	<u>0</u>
(G)	(H)	(I)	(J)

### Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>0</u>	<u>5</u>
(K)	(L)

### Injury and Illness Types

Total number of...			
(M)			
(1) Injury	<u>1</u>	(4) Poisoning	<u>0</u>
(2) Skin Disorder	<u>0</u>	(5) Hearing Loss	<u>0</u>
(3) Respiratory Condition	<u>0</u>	(6) All Other Illnesses	<u>0</u>

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Public reporting burden for this collection of information is estimated to average 58 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave. NW, Washington, DC 20210. Do not send the completed forms to this office.

### Establishment information

Your establishment name Battery Solutions

Street 618 E Auto Center Dr Suite 111

City Mesa State AZ Zip 85204

Industry description (e.g., Manufacture of motor truck trailers)  
Warehouse and Office for Battery Recycling

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)

5 0 9 3

OR North American Industrial Classification (NAICS), if known (e.g., 336212)

### Employment information

Annual average number of employees 42

Total hours worked by all employees last year 57,765

### Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Thomas R. Jones  
Company executive

CEO  
Title

248-446-3001  
Phone

1/31/2019  
Date





## SUMMARY OF WORK-RELATED INJURIES AND ILLNESSES

Year 2018

### Michigan Department of Licensing and Regulatory Affairs Michigan Occupational Safety and Health Administration (MIOSHA)

Form Approved OMB No. 1218-0176

All establishments covered by Public Law of 1970 (P.O. 91-596) and Michigan Occupational Safety and Health Act 154, P.A. 1974, Part 11, Michigan Administrative Rule for Recording and Reporting of Injuries and Illnesses, must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary. You may be fined for failure to comply.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the MIOSHA Form 300 in its entirety. They also have limited access to the MIOSHA Form 301 or its equivalent. See Part 11, R408.22135 Rule 1135, in MIOSHA's Recordkeeping rule, for further details on the access provisions for these forms.

#### Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
(G)	(H)	(I)	(J)

#### Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>0</u>	<u>0</u>
(K)	(L)

#### Injury and Illness Types

Total number of... (M)			
(1) Injury	<u>0</u>	(4) Poisonings	<u>0</u>
(2) Skin Disorder	<u>0</u>	(5) Hearing Loss	<u>0</u>
(3) Respiratory Conditions	<u>0</u>	(6) All Other Illnesses	<u>0</u>

#### Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Public reporting burden for this collection of information is estimated to average 50 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: Michigan Department of Licensing and Regulatory Affairs, MIOSHA, MTSD, 7150 Harris Dr. P.O. Box 30643, Lansing MI 48909-8143. (517) 322-1848. Do not send the completed forms to this office.

MIOSHA-300A (Rev. 09/09) Effective 01/01/2004

#### Establishment information

Your establishment name Battery Solutions Recovery, LLC

Street 7266 Kensington Road

City Brighton State MI Zip 48116

Industry description (e.g., Manufacture of motor truck trailers)  
Battery recycling

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)

OR North American Industrial Classification (NAICS), if known (e.g., 336212)

4 2 3 9 3 0

#### Employment information

Annual average number of employees 5

Total hours worked by all employees last year 9561

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Adam Hancock  
Company Executive

Operations Manager  
Title

(248)573-4053  
Phone

1/8/2019  
Date

# Tier II Emergency and Hazardous Chemical Inventory

Pa

Reporting Period From January 1, 2018 to December 31, 2018

☒ Annual ☐ Update ☐ Revised ☒ Facility Information has changed from the last submission

<b>Facility Identification</b> MI SARA ID: 20237 LEPC: LIVINGSTON COUNTY Facility Name: Howell Lat/Long: 42.56689/-83.8351 Company Name: Battery Solutions, LLC Maximum Occupants: 181 Physical Location: 5900 Brighton Pines Court, Howell, MI 48843 Nature of Business: Spent Battery Collection, sorting and packaging County: LIVINGSTON NAICS Code: 423930 Fire Department: Brighton Area FD SIC Code: 5093 Phone: 248-446-3001 Dun and Brad No: 849307608 <input checked="" type="checkbox"/> Manned <input type="checkbox"/> Unmanned Email: tom@batterysolutions.com Facility ID: 20553				<b>Owner/Operator Details</b> Name: Battery Solutions, LLC Address: 5900 Brighton Pines Ct Howell, MI 48843, United States Phone: 248-446-3001 Email: tom@batterysolutions.com																										
Subject to EPCRA Section 312 (Annual Inventory)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Subject to Section 112r of Clean Air Act (CAA)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No RMP Facility ID: Subject to EPCRA Section 313 (Toxic Release Inventory - TRI)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No TRI Facility ID:				<b>Parent Company Details</b> Name: Battery Solutions, LLC Dun and Brad No: 849307608 Address: 5900 Brighton Pines Court Howell, MI 48843, United States Phone: 248-446-5633 Email: tom@batterysolutions.com																										
<b>Mailing Address</b> Company Name: Battery Solutions Attention: Don Lynch Street Address 1: 5900 Brighton Pines Court Street Address 2: City: Howell State: MI Zip: 48843 Phone: 248-446-3001 Country: United States				<b>Tier II Information Contact</b> Name: Tom Edwards Title: QEHS Manager Phone: 248-446-3001 24 Hr.Phone: 517-294-6330 Email: tom@batterysolutions.com																										
<b>Emergency Contacts</b> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th>Name</th> <th>Title</th> <th>Phone</th> <th>24 Hr.Phone</th> <th>Email</th> </tr> </thead> <tbody> <tr> <td>Steve Novack</td> <td>Manager</td> <td>248-446-3001</td> <td>734-658-4373</td> <td>snovack@batterysolutions.com</td> </tr> <tr> <td>Tom Edwards</td> <td>QEHS Manager</td> <td>248-446-3001</td> <td>517-294-6330</td> <td>compliance@batterysolutions.com</td> </tr> <tr> <td>Doug Smith</td> <td>Director of Battery Technology</td> <td>248-446-3001</td> <td>810-577-2411</td> <td>doug@batterysolutions.com</td> </tr> <tr> <td>Jeff Weber</td> <td>Warehouse Operations Mgr</td> <td>248-446-3001</td> <td>517-294-6330</td> <td>jweber@batterysolutions.com</td> </tr> </tbody> </table>				Name	Title	Phone	24 Hr.Phone	Email	Steve Novack	Manager	248-446-3001	734-658-4373	snovack@batterysolutions.com	Tom Edwards	QEHS Manager	248-446-3001	517-294-6330	compliance@batterysolutions.com	Doug Smith	Director of Battery Technology	248-446-3001	810-577-2411	doug@batterysolutions.com	Jeff Weber	Warehouse Operations Mgr	248-446-3001	517-294-6330	jweber@batterysolutions.com	<b>Facility Emergency Planning Coordinator</b> Name: Steve Novack Title: Warehouse Sort Manager Phone: 248-446-3001 24 Hr.Phone: 734-658-4373 Email: snovack@batterysolutions.com	
Name	Title	Phone	24 Hr.Phone	Email																										
Steve Novack	Manager	248-446-3001	734-658-4373	snovack@batterysolutions.com																										
Tom Edwards	QEHS Manager	248-446-3001	517-294-6330	compliance@batterysolutions.com																										
Doug Smith	Director of Battery Technology	248-446-3001	810-577-2411	doug@batterysolutions.com																										
Jeff Weber	Warehouse Operations Mgr	248-446-3001	517-294-6330	jweber@batterysolutions.com																										
Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages one through 6, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. Tom Edwards, QEHS Manager 1/16/2019 11:27:59 AM 248-446-3001 Tom Edwards Name and official title of owner/operator or authorized representative Date Signed Telephone Number Signature				<b>Optional Attachments</b> <input checked="" type="checkbox"/> Site Plan <input type="checkbox"/> Site Coordinate Abbreviator <input type="checkbox"/> Other Safeguard measures <input checked="" type="checkbox"/> Facility Emergency Response																										

# Tier II Emergency and Hazardous Chemical Inventory

Facility/Site Name: Howell MI SARA ID: 20237  
Reporting Period From January 1, 2018 to December 31, 2018

Chemical Description	Physical Hazards	Health Hazards					
Chemical ID: 582553 Check if Chemical Information is changed from the last submission: <input checked="" type="checkbox"/> CAS #: N/A Trade Secret: <input type="checkbox"/> Chemical Name: LEAD ACID BATTERY EHS: <input type="checkbox"/> Contains EHS: <input checked="" type="checkbox"/> Exceeds TPQ: <input checked="" type="checkbox"/> EHS Name: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input checked="" type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas <a href="#">MSDS</a> / <a href="#">SDS</a> Chemical Added On: Check if the chemical is below reporting threshold: <input type="checkbox"/>	<input type="checkbox"/> Combustible dust <input checked="" type="checkbox"/> Corrosive to metal <input type="checkbox"/> Explosive <input type="checkbox"/> Flammable (gases, aerosols, liquids, or solids) <input type="checkbox"/> Gas under pressure <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> In contact with water emits flammable gas <input type="checkbox"/> Organic peroxide <input type="checkbox"/> Oxidizer (liquid, solid or gas) <input type="checkbox"/> Pyrophoric (liquid or solid) <input type="checkbox"/> Pyrophoric gas <input type="checkbox"/> Self-heating <input type="checkbox"/> Self-reactive	<input type="checkbox"/> Acute toxicity (any route of exposure) <input type="checkbox"/> Aspiration hazard <input type="checkbox"/> Carcinogenicity <input type="checkbox"/> Germ cell mutagenicity <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> Reproductive toxicity <input checked="" type="checkbox"/> Respiratory or skin sensitization <input checked="" type="checkbox"/> Serious eye damage or eye irritation <input type="checkbox"/> Simple asphyxiant <input checked="" type="checkbox"/> Skin corrosion or irritation <input type="checkbox"/> Specific target organ toxicity (single or repeated exposure)					
Inventory	Storage Codes & Location						
Max Daily Amt (lbs): 484761 Max Daily Amt Code: 10 Avg Daily Amt (lbs): 298004 Avg Daily Amt Code: 10 Max Amt in Largest Container (lbs): No of days onsite: 365	Container Type	Pressure	Temperature	Storage Location	Description	Is Confidential	Max Amt At Location(lbs)
	[R]Other Desc:	[1]Ambient pressure	[4]Ambient temperature	ON PALLETS ON RACKS			
	[R]Other Desc:	[1]Ambient pressure	[4]Ambient temperature	on pallets on racks			394492
	[R]Other Desc:	[1]Ambient pressure	[4]Ambient temperature	on pallets in rack			
	[R]Other Desc: Used in Forklifts and floor scrubbers (Confidential)	[1]Ambient pressure (Confidential)	[4]Ambient temperature (Confidential)	in equipment (Confidential)	(Confidential)		11370 (Confidential)
MIXTURE COMPONENTS							
Chemical Name	%	CAS #	EHS	EHS Name	Max Daily Amount (lbs)	Max Daily Amount Code	
SULFURIC ACID	8	7664-93-9	<input checked="" type="checkbox"/>	SULFURIC ACID	38780.88	07	
LEAD	66	7439-92-1	<input type="checkbox"/>		319942.26	10	

# Tier II Emergency and Hazardous Chemical Inventory

Facility/Site Name: **Howell** MI SARA ID: **20237**

Reporting Period From January 1, 2018 to December 31, 2018

Chemical Description	Physical Hazards	Health Hazards																															
Chemical ID: 582556 Check if Chemical Information is changed from the last submission: <input checked="" type="checkbox"/> CAS #: N/A Trade Secret: <input type="checkbox"/> <b>Chemical Name:</b> LITHIUM BATTERY EHS: <input type="checkbox"/> Contains EHS: <input checked="" type="checkbox"/> Exceeds TPQ: <input checked="" type="checkbox"/> EHS Name: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input checked="" type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas Chemical Added On: Check if the chemical is below reporting threshold: <input type="checkbox"/>	<input type="checkbox"/> Combustible dust <input type="checkbox"/> Corrosive to metal <input type="checkbox"/> Explosive <input type="checkbox"/> Flammable (gases, aerosols, liquids, or solids) <input type="checkbox"/> Gas under pressure <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> In contact with water emits flammable gas <input type="checkbox"/> Organic peroxide <input type="checkbox"/> Oxidizer (liquid, solid or gas) <input type="checkbox"/> Pyrophoric (liquid or solid) <input type="checkbox"/> Pyrophoric gas <input type="checkbox"/> Self-heating <input type="checkbox"/> Self-reactive	<input type="checkbox"/> Acute toxicity (any route of exposure) <input type="checkbox"/> Aspiration hazard <input type="checkbox"/> Carcinogenicity <input type="checkbox"/> Germ cell mutagenicity <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> Reproductive toxicity <input checked="" type="checkbox"/> Respiratory or skin sensitization <input checked="" type="checkbox"/> Serious eye damage or eye irritation <input type="checkbox"/> Simple asphyxiant <input type="checkbox"/> Skin corrosion or irritation <input type="checkbox"/> Specific target organ toxicity (single or repeated exposure)																															
Inventory	Storage Codes & Location																																
Max Daily Amt (lbs): 714228 Max Daily Amt Code: 11 Avg Daily Amt (lbs): 520404 Avg Daily Amt Code: 11 Max Amt in Largest Container (lbs): 2000 No of days onsite: 365	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Container Type</th> <th>Pressure</th> <th>Temperature</th> <th>Storage Location</th> <th>Description</th> <th>Is Confidential</th> <th>Max Amt At Location(lbs)</th> </tr> </thead> <tbody> <tr> <td>[D]Steel drum</td> <td>[1]Ambient pressure</td> <td>[4]Ambient temperature</td> <td>On Pallets in Racks</td> <td></td> <td></td> <td></td> </tr> <tr> <td>[K]Box</td> <td>[1]Ambient pressure</td> <td>[4]Ambient temperature</td> <td>On Pallets in Racks</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Container Type	Pressure	Temperature	Storage Location	Description	Is Confidential	Max Amt At Location(lbs)	[D]Steel drum	[1]Ambient pressure	[4]Ambient temperature	On Pallets in Racks				[K]Box	[1]Ambient pressure	[4]Ambient temperature	On Pallets in Racks														
Container Type	Pressure	Temperature	Storage Location	Description	Is Confidential	Max Amt At Location(lbs)																											
[D]Steel drum	[1]Ambient pressure	[4]Ambient temperature	On Pallets in Racks																														
[K]Box	[1]Ambient pressure	[4]Ambient temperature	On Pallets in Racks																														
MIXTURE COMPONENTS																																	
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Chemical Name</th> <th>%</th> <th>CAS #</th> <th>EHS</th> <th>EHS Name</th> <th>Max Daily Amount (lbs)</th> <th>Max Daily Amount Code</th> </tr> </thead> <tbody> <tr> <td>LITHIUM METAL</td> <td>5</td> <td>7439-93-2</td> <td><input type="checkbox"/></td> <td></td> <td>35711.4</td> <td>07</td> </tr> <tr> <td>Sulfur Dioxide</td> <td>30</td> <td>7446-09-5</td> <td><input checked="" type="checkbox"/></td> <td>Sulfur dioxide</td> <td>214268.4</td> <td>10</td> </tr> <tr> <td>Lithium Chloride</td> <td>2</td> <td>7719-09-7</td> <td><input type="checkbox"/></td> <td></td> <td>14284.56</td> <td>06</td> </tr> </tbody> </table>	Chemical Name	%	CAS #	EHS	EHS Name	Max Daily Amount (lbs)	Max Daily Amount Code	LITHIUM METAL	5	7439-93-2	<input type="checkbox"/>		35711.4	07	Sulfur Dioxide	30	7446-09-5	<input checked="" type="checkbox"/>	Sulfur dioxide	214268.4	10	Lithium Chloride	2	7719-09-7	<input type="checkbox"/>		14284.56	06					
Chemical Name	%	CAS #	EHS	EHS Name	Max Daily Amount (lbs)	Max Daily Amount Code																											
LITHIUM METAL	5	7439-93-2	<input type="checkbox"/>		35711.4	07																											
Sulfur Dioxide	30	7446-09-5	<input checked="" type="checkbox"/>	Sulfur dioxide	214268.4	10																											
Lithium Chloride	2	7719-09-7	<input type="checkbox"/>		14284.56	06																											

# Tier II Emergency and Hazardous Chemical Inventory

Facility/Site Name: **Howell** MI SARA ID: **20237**

Reporting Period From January 1, 2018 to December 31, 2018

Chemical Description	Physical Hazards	Health Hazards					
Chemical ID: 582555 Check if Chemical Information is changed from the last submission: <input checked="" type="checkbox"/> CAS #: N/A Trade Secret: <input type="checkbox"/> <b>Chemical Name:</b> NICKEL CADMIUM BATTERY (WET) EHS: <input type="checkbox"/> Contains EHS: <input type="checkbox"/> Exceeds TPQ: <input type="checkbox"/> EHS Name: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas <a href="#">MSDS</a> / <a href="#">SDS</a> Chemical Added On: Check if the chemical is below reporting threshold: <input type="checkbox"/>	<input type="checkbox"/> Combustible dust <input type="checkbox"/> Corrosive to metal <input type="checkbox"/> Explosive <input type="checkbox"/> Flammable (gases, aerosols, liquids, or solids) <input type="checkbox"/> Gas under pressure <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> In contact with water emits flammable gas <input type="checkbox"/> Organic peroxide <input type="checkbox"/> Oxidizer (liquid, solid or gas) <input type="checkbox"/> Pyrophoric (liquid or solid) <input type="checkbox"/> Pyrophoric gas <input type="checkbox"/> Self-heating <input type="checkbox"/> Self-reactive	<input type="checkbox"/> Acute toxicity (any route of exposure) <input type="checkbox"/> Aspiration hazard <input type="checkbox"/> Carcinogenicity <input type="checkbox"/> Germ cell mutagenicity <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> Reproductive toxicity <input checked="" type="checkbox"/> Respiratory or skin sensitization <input checked="" type="checkbox"/> Serious eye damage or eye irritation <input type="checkbox"/> Simple asphyxiant <input checked="" type="checkbox"/> Skin corrosion or irritation <input type="checkbox"/> Specific target organ toxicity (single or repeated exposure)					
Inventory	Storage Codes & Location						
Max Daily Amt (lbs): 247915 Max Daily Amt Code: 10 Avg Daily Amt (lbs): 182889 Avg Daily Amt Code: 10 Max Amt in Largest Container (lbs): 2000 No of days onsite: 365	Container Type	Pressure	Temperature	Storage Location	Description	Is Confidential	Max Amt At Location(lbs)
	[R]Other Desc:	[1]Ambient pressure	[4]Ambient temperature	On Pallets on Racks			
MIXTURE COMPONENTS							
Chemical Name	%	CAS #	EHS	EHS Name	Max Daily Amount (lbs)	Max Daily Amount Code	
Potassium Hydroxide	6	1310-58-3	<input type="checkbox"/>		14874.9	06	



# Tier II Emergency and Hazardous Chemical Inventory

Facility/Site Name: **Howell** MI SARA ID: **20237**

Reporting Period From January 1, 2018 to December 31, 2018

Chemical Description	Physical Hazards	Health Hazards													
Chemical ID: 582554 Check if Chemical Information is changed from the last submission: <input checked="" type="checkbox"/> <b>CAS #:</b> N/A Trade Secret: <input type="checkbox"/> <b>Chemical Name:</b> NICKEL CADMIUM BATTERY(Dry) EHS: <input type="checkbox"/> Contains EHS: <input checked="" type="checkbox"/> Exceeds TPQ: <input checked="" type="checkbox"/> EHS Name: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas <a href="#">MSDS</a> <a href="#">/SDS</a> Chemical Added On: Check if the chemical is below reporting threshold: <input type="checkbox"/>	<input type="checkbox"/> Combustible dust <input type="checkbox"/> Corrosive to metal <input type="checkbox"/> Explosive <input type="checkbox"/> Flammable (gases, aerosols, liquids, or solids) <input type="checkbox"/> Gas under pressure <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> In contact with water emits flammable gas <input type="checkbox"/> Organic peroxide <input type="checkbox"/> Oxidizer (liquid, solid or gas) <input type="checkbox"/> Pyrophoric (liquid or solid) <input type="checkbox"/> Pyrophoric gas <input type="checkbox"/> Self-heating <input type="checkbox"/> Self-reactive	<input type="checkbox"/> Acute toxicity (any route of exposure) <input type="checkbox"/> Aspiration hazard <input type="checkbox"/> Carcinogenicity <input type="checkbox"/> Germ cell mutagenicity <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC) <input type="checkbox"/> Reproductive toxicity <input type="checkbox"/> Respiratory or skin sensitization <input checked="" type="checkbox"/> Serious eye damage or eye irritation <input type="checkbox"/> Simple asphyxiant <input checked="" type="checkbox"/> Skin corrosion or irritation <input type="checkbox"/> Specific target organ toxicity (single or repeated exposure)													
Inventory	Storage Codes & Location														
Max Daily Amt (lbs): 279686 Max Daily Amt Code: 10 Avg Daily Amt (lbs): 148028 Avg Daily Amt Code: 10 Max Amt in Largest Container (lbs): 2000 No of days onsite: 365	<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:15%;">Container Type</th> <th style="width:15%;">Pressure</th> <th style="width:15%;">Temperature</th> <th style="width:15%;">Storage Location</th> <th style="width:15%;">Description</th> <th style="width:15%;">Is Confidential</th> <th style="width:15%;">Max Amt At Location(lbs)</th> </tr> </thead> <tbody> <tr> <td>[K]Box</td> <td>[1]Ambient pressure</td> <td>[4]Ambient temperature</td> <td>ON PALLETS IN RACKS</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Container Type	Pressure	Temperature	Storage Location	Description	Is Confidential	Max Amt At Location(lbs)	[K]Box	[1]Ambient pressure	[4]Ambient temperature	ON PALLETS IN RACKS			
Container Type	Pressure	Temperature	Storage Location	Description	Is Confidential	Max Amt At Location(lbs)									
[K]Box	[1]Ambient pressure	[4]Ambient temperature	ON PALLETS IN RACKS												
MIXTURE COMPONENTS															
<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:25%;">Chemical Name</th> <th style="width:5%;">%</th> <th style="width:10%;">CAS #</th> <th style="width:5%;">EHS</th> <th style="width:25%;">EHS Name</th> <th style="width:15%;">Max Daily Amount (lbs)</th> <th style="width:15%;">Max Daily Amount Code</th> </tr> </thead> <tbody> <tr> <td>CADMIUM OXIDE</td> <td>28</td> <td>1306-19-0</td> <td><input checked="" type="checkbox"/></td> <td>CADMIUM OXIDE</td> <td>78312.08</td> <td>09</td> </tr> </tbody> </table>	Chemical Name	%	CAS #	EHS	EHS Name	Max Daily Amount (lbs)	Max Daily Amount Code	CADMIUM OXIDE	28	1306-19-0	<input checked="" type="checkbox"/>	CADMIUM OXIDE	78312.08	09	
Chemical Name	%	CAS #	EHS	EHS Name	Max Daily Amount (lbs)	Max Daily Amount Code									
CADMIUM OXIDE	28	1306-19-0	<input checked="" type="checkbox"/>	CADMIUM OXIDE	78312.08	09									

Important: Please read all instructions before completing form

**Reporting period from January 1 to December 31, 2018***Facility Identification (2a) – Facility Location*

Facility Name: **Battery Solutions LLC**  
 Street Address: **Mesa, AZ 85204**  
 Phone: **480-248-3100**  
 Fax: **450-248-3101**  
 Email: **scott@batterysolutions.com**  
 County: **Maricopa**

Is Manned: **Yes**      Emergency Planning: **Yes**  
 Max Occupancy: **102**      Accident Prevention: **Yes**

*Mailing Address*

Name: **Tom Edwards**  
 Title: **Manager- Quality , Environmental Health**  
 Company: **Battery Solutions LLC**  
 Mailing Address: **4930 Holtz drive**  
**Wixom, MI 48393**

SIC Code: **5093-0500**  
 Dun & Bradstreet Number: **849307608**  
 NAICS Code: **423930**  
 TRI Number: **383028054**  
 Latitude: **33.3836420000**  
 Longitude: **-111.8160410000**

Fire Department with  
Jurisdiction: **Mesa Fire Department**

Tribal Name, if on Indian Land: **Not On Tribal Land**

*Owner/Operator Information (2b)*

Name: **Thomas Bjarnemark**  
 Title: **CEO**  
 Mailing Address: **4930 Holtz drive**  
**Wixom, MI 48393**  
 Phone: **248-446-3001**  
 Fax: **248-446-1927**  
 Email: **thomas@batterysolutions.com**

*Regulatory Point Of Contact Information (2c)*

Name: **Tom Edwards**  
 Title: **Manager- Quality , Environmental Health**  
 Company: **Battery Solutions LLC**  
 Mailing Address: **4930 Holtz Drive**  
**Wixom, MI 48393**  
 Phone: **248-446-5633**  
 Fax: **248-446-1927**  
 Email: **tom@batterysolutions.com**

*Emergency Contact Information (2d)**First Emergency Contact*

Name: **Scott Sidum**  
 Title: **Operations Manager**  
 Phone: **480-248-3100**  
 24 Hr. Phone: **480-298-9293**  
 Email: **scott@batterysolutions.com**

*Second Emergency Contact*

Name: **Tom Edwards**  
 Title: **Manager- Quality , Environmental Health**  
 Phone: **248-446-3001**  
 24 Hr. Phone: **248-446-5633**  
 Email: **tom@batterysolutions.com**

*Certification (Read and sign after completing all sections)*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in all pages and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner/operator OR owner/operator's authorized representative

Name: **Tom Edwards**

Title: **Manager, Quality-**

Signature: **Tom Edwards**

Date Signed: **1/15/2019**

Facility Name: **Battery Solutions LLC**  
City: **Mesa, AZ 85204**

## First Emergency Contact

Name: **Scott Sidum**  
Title: **Operations Manager**  
Phone: **480-248-3100**  
24 Hr. Phone: **480-298-9293**  
Email: **scott@batterysolutions.com**

*Chemical Description (3)*CAS: **7664-93-9**Chemical Name: **battery acid**EHS: ☒EHS Name: **Sulfuric Acid**

Check all that apply: ☐ Pure ☒ Solid  
☒ Mix ☒ Liquid

☐ Gas☐ Trade Scret*Physical Hazards (4)*

Check all that apply:

- ☐ Flammable (gases, aerosols, liquids, or solids)  
☐ Gas under pressure  
☐ Explosive  
☐ Self-heating  
☐ Pyrophoric (liquid or solid)  
☐ Pyrophoric Gas  
☐ Corrosive to metal  
☐ Oxidizer (liquid, solid, or gas)  
☐ Organic peroxide  
☐ Self-reactive  
☐ In contact with water emits flammable gas  
☐ Combustible Dust  
☐ Hazard Not Otherwise Classified (HNOC)

*Health Hazards (5)*

Check all that apply:

- ☐ Carcinogenicity  
☐ Acute toxicity (any route of exposure)  
☐ Reproductive toxicity  
☐ Skin Corrosion or Irritation  
☐ Respiratory or Skin Sensitization  
☐ Serious eye damage or eye irritation  
☐ Specific target organ toxicity (single or repeated exposure)  
☐ Aspiration Hazard  
☐ Germ cell mutagenicity  
☐ Simple Asphyxiant  
☐ Hazard Not Otherwise Classified (HNOC)

*Inventory (6)*Max Daily Amount: **7**Actual Max Daily Amount (lbs): **25420**Avg. Daily Amount: **6**Actual Avg. Daily Amount (lbs): **11930**No. of Days on Site Per Year: **365***Storage Codes and Locations (7)*

Container

Pressure

Temperature

Storage Location

**R- Other****1- Ambient pressure****4- Ambient Temperature****stored on pallets in racks****R- Other****1- Ambient pressure****4- Ambient Temperature****in use Forklift batteries***Chemical Description (3)*CAS: **1306-19-0**Chemical Name: **cadmium oxide**EHS: ☒EHS Name: **Cadmium Oxide**

Check all that apply: ☐ Pure ☒ Solid  
☒ Mix ☐ Liquid

☐ Gas☐ Trade Scret*Physical Hazards (4)*

Check all that apply:

- ☐ Flammable (gases, aerosols, liquids, or solids)  
☐ Gas under pressure  
☐ Explosive  
☐ Self-heating  
☐ Pyrophoric (liquid or solid)  
☐ Pyrophoric Gas  
☐ Corrosive to metal  
☐ Oxidizer (liquid, solid, or gas)  
☐ Organic peroxide  
☐ Self-reactive  
☐ In contact with water emits flammable gas  
☐ Combustible Dust  
☒ Hazard Not Otherwise Classified (HNOC)

*Health Hazards (5)*

Check all that apply:

- ☐ Carcinogenicity  
☐ Acute toxicity (any route of exposure)  
☐ Reproductive toxicity  
☒ Skin Corrosion or Irritation  
☒ Respiratory or Skin Sensitization  
☒ Serious eye damage or eye irritation  
☐ Specific target organ toxicity (single or repeated exposure)  
☐ Aspiration Hazard  
☐ Germ cell mutagenicity  
☐ Simple Asphyxiant  
☐ Hazard Not Otherwise Classified (HNOC)

*Inventory (6)*Max Daily Amount: **7**Actual Max Daily Amount (lbs): **33769**Avg. Daily Amount: **6**Actual Avg. Daily Amount (lbs): **18763**No. of Days on Site Per Year: **365***Storage Codes and Locations (7)*

Container

Pressure

Temperature

Storage Location

**R- Other****1- Ambient pressure****4- Ambient Temperature****stored on pallets in racks**

<b>Chemical Description (3)</b> CAS: <b>1310-58-3</b> Chemical Name: <b>potassium hydroxide,</b> EHS: <input checked="" type="checkbox"/> EHS Name: <b>Potassium Hydroxide</b> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Solid <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Liquid <input type="checkbox"/> Gas <input type="checkbox"/> Trade Scret		<b>Physical Hazards (4)</b> Check all that apply: <input type="checkbox"/> Flammable (gases, aerosols, liquids, or solids) <input type="checkbox"/> Gas under pressure <input type="checkbox"/> Explosive <input type="checkbox"/> Self-heating <input type="checkbox"/> Pyrophoric (liquid or solid) <input type="checkbox"/> Pyrophoric Gas <input type="checkbox"/> Corrosive to metal <input type="checkbox"/> Oxidizer (liquid, solid, or gas) <input type="checkbox"/> Organic peroxide <input type="checkbox"/> Self-reactive <input type="checkbox"/> In contact with water emits flammable gas <input type="checkbox"/> Combustible Dust <input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC)		<b>Health Hazards (5)</b> Check all that apply: <input checked="" type="checkbox"/> Carcinogenicity <input type="checkbox"/> Acute toxicity (any route of exposure) <input type="checkbox"/> Reproductive toxicity <input checked="" type="checkbox"/> Skin Corrosion or Irritation <input type="checkbox"/> Respiratory or Skin Sensitization <input checked="" type="checkbox"/> Serious eye damage or eye irritation <input type="checkbox"/> Specific target organ toxicity (single or repeated exposure) <input type="checkbox"/> Aspiration Hazard <input type="checkbox"/> Germ cell mutagenicity <input type="checkbox"/> Simple Asphyxiant <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC)		<b>Inventory (6)</b> Max Daily Amount: <b>5</b> Actual Max Daily Amount (lbs): <b>5412</b> Avg. Daily Amount: <b>4</b> Actual Avg. Daily Amount (lbs): <b>3388</b> No. of Days on Site Per Year: <b>365</b>	
<b>Storage Codes and Locations (7)</b> Container Pressure Temperature Storage Location <b>R- Other 1- Ambient pressure 4- Ambient Temperature stored on pallets in racks</b>							
<b>Chemical Description (3)</b> CAS: <b>7446-09-5</b> Chemical Name: <b>sulfur dioxide</b> EHS: <input checked="" type="checkbox"/> EHS Name: <b>Sulfur Dioxide</b> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Solid <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Liquid <input type="checkbox"/> Gas <input type="checkbox"/> Trade Scret		<b>Physical Hazards (4)</b> Check all that apply: <input checked="" type="checkbox"/> Flammable (gases, aerosols, liquids, or solids) <input type="checkbox"/> Gas under pressure <input type="checkbox"/> Explosive <input type="checkbox"/> Self-heating <input type="checkbox"/> Pyrophoric (liquid or solid) <input type="checkbox"/> Pyrophoric Gas <input type="checkbox"/> Corrosive to metal <input type="checkbox"/> Oxidizer (liquid, solid, or gas) <input type="checkbox"/> Organic peroxide <input type="checkbox"/> Self-reactive <input type="checkbox"/> In contact with water emits flammable gas <input type="checkbox"/> Combustible Dust <input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC)		<b>Health Hazards (5)</b> Check all that apply: <input type="checkbox"/> Carcinogenicity <input type="checkbox"/> Acute toxicity (any route of exposure) <input type="checkbox"/> Reproductive toxicity <input checked="" type="checkbox"/> Skin Corrosion or Irritation <input checked="" type="checkbox"/> Respiratory or Skin Sensitization <input checked="" type="checkbox"/> Serious eye damage or eye irritation <input type="checkbox"/> Specific target organ toxicity (single or repeated exposure) <input type="checkbox"/> Aspiration Hazard <input type="checkbox"/> Germ cell mutagenicity <input type="checkbox"/> Simple Asphyxiant <input type="checkbox"/> Hazard Not Otherwise Classified (HNOC)		<b>Inventory (6)</b> Max Daily Amount: <b>9</b> Actual Max Daily Amount (lbs): <b>76167</b> Avg. Daily Amount: <b>8</b> Actual Avg. Daily Amount (lbs): <b>57265</b> No. of Days on Site Per Year: <b>365</b>	
<b>Storage Codes and Locations (7)</b> Container Pressure Temperature Storage Location <b>K- Box 1- Ambient pressure 4- Ambient Temperature stored on pallets in racks</b> <b>D- Steel drum 1- Ambient pressure 4- Ambient Temperature stored on pallets in racks</b>							

<b>Chemical Description (3)</b> CAS: <b>7719-09-7</b> Chemical Name: <b>thionyl chloride</b> EHS: <input checked="" type="checkbox"/> EHS Name: <b>Lithium Chloride</b> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Solid <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Liquid <input type="checkbox"/> Gas <input type="checkbox"/> Trade Secret	<b>Physical Hazards (4)</b> Check all that apply: <input type="checkbox"/> Flammable (gases, aerosols, liquids, or solids) <input type="checkbox"/> Gas under pressure <input type="checkbox"/> Explosive <input type="checkbox"/> Self-heating <input type="checkbox"/> Pyrophoric (liquid or solid) <input type="checkbox"/> Pyrophoric Gas <input type="checkbox"/> Corrosive to metal <input type="checkbox"/> Oxidizer (liquid, solid, or gas) <input type="checkbox"/> Organic peroxide <input type="checkbox"/> Self-reactive <input type="checkbox"/> In contact with water emits flammable gas <input type="checkbox"/> Combustible Dust <input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC)	<b>Health Hazards (5)</b> Check all that apply: <input type="checkbox"/> Carcinogenicity <input type="checkbox"/> Acute toxicity (any route of exposure) <input type="checkbox"/> Reproductive toxicity <input checked="" type="checkbox"/> Skin Corrosion or Irritation <input checked="" type="checkbox"/> Respiratory or Skin Sensitization <input checked="" type="checkbox"/> Serious eye damage or eye irritation <input type="checkbox"/> Specific target organ toxicity (single or repeated exposure) <input type="checkbox"/> Aspiration Hazard <input type="checkbox"/> Germ cell mutagenicity <input type="checkbox"/> Simple Asphyxiant <input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC)	<b>Inventory (6)</b> Max Daily Amount: <b>5</b> Actual Max Daily Amount (lbs): <b>5078</b> Avg. Daily Amount: <b>4</b> Actual Avg. Daily Amount (lbs): <b>3818</b> No. of Days on Site Per Year: <b>365</b>												
<b>Storage Codes and Locations (7)</b> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Container</th> <th style="text-align: left;">Pressure</th> <th style="text-align: left;">Temperature</th> <th style="text-align: left;">Storage Location</th> </tr> </thead> <tbody> <tr> <td><b>K- Box</b></td> <td><b>1- Ambient pressure</b></td> <td><b>4- Ambient Temperature</b></td> <td><b>stored on pallets in racks</b></td> </tr> <tr> <td><b>D- Steel drum</b></td> <td><b>1- Ambient pressure</b></td> <td><b>4- Ambient Temperature</b></td> <td><b>stored on pallets in racks</b></td> </tr> </tbody> </table>				Container	Pressure	Temperature	Storage Location	<b>K- Box</b>	<b>1- Ambient pressure</b>	<b>4- Ambient Temperature</b>	<b>stored on pallets in racks</b>	<b>D- Steel drum</b>	<b>1- Ambient pressure</b>	<b>4- Ambient Temperature</b>	<b>stored on pallets in racks</b>
Container	Pressure	Temperature	Storage Location												
<b>K- Box</b>	<b>1- Ambient pressure</b>	<b>4- Ambient Temperature</b>	<b>stored on pallets in racks</b>												
<b>D- Steel drum</b>	<b>1- Ambient pressure</b>	<b>4- Ambient Temperature</b>	<b>stored on pallets in racks</b>												
<b>Chemical Description (3)</b> CAS: <b>7439-93-2</b> Chemical Name: <b>lithium, metallic</b> EHS: <input type="checkbox"/> EHS Name: Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Solid <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Liquid <input type="checkbox"/> Gas <input type="checkbox"/> Trade Secret	<b>Physical Hazards (4)</b> Check all that apply: <input checked="" type="checkbox"/> Flammable (gases, aerosols, liquids, or solids) <input type="checkbox"/> Gas under pressure <input type="checkbox"/> Explosive <input type="checkbox"/> Self-heating <input type="checkbox"/> Pyrophoric (liquid or solid) <input checked="" type="checkbox"/> Pyrophoric Gas <input type="checkbox"/> Corrosive to metal <input type="checkbox"/> Oxidizer (liquid, solid, or gas) <input type="checkbox"/> Organic peroxide <input type="checkbox"/> Self-reactive <input checked="" type="checkbox"/> In contact with water emits flammable gas <input type="checkbox"/> Combustible Dust <input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC)	<b>Health Hazards (5)</b> Check all that apply: <input type="checkbox"/> Carcinogenicity <input type="checkbox"/> Acute toxicity (any route of exposure) <input type="checkbox"/> Reproductive toxicity <input checked="" type="checkbox"/> Skin Corrosion or Irritation <input type="checkbox"/> Respiratory or Skin Sensitization <input type="checkbox"/> Serious eye damage or eye irritation <input type="checkbox"/> Specific target organ toxicity (single or repeated exposure) <input type="checkbox"/> Aspiration Hazard <input type="checkbox"/> Germ cell mutagenicity <input type="checkbox"/> Simple Asphyxiant <input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC)	<b>Inventory (6)</b> Max Daily Amount: <b>6</b> Actual Max Daily Amount (lbs): <b>12695</b> Avg. Daily Amount: <b>5</b> Actual Avg. Daily Amount (lbs): <b>9544</b> No. of Days on Site Per Year: <b>365</b>												
<b>Storage Codes and Locations (7)</b> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Container</th> <th style="text-align: left;">Pressure</th> <th style="text-align: left;">Temperature</th> <th style="text-align: left;">Storage Location</th> </tr> </thead> <tbody> <tr> <td><b>K- Box</b></td> <td><b>1- Ambient pressure</b></td> <td><b>4- Ambient Temperature</b></td> <td><b>stored on pallets in racks</b></td> </tr> <tr> <td><b>D- Steel drum</b></td> <td><b>1- Ambient pressure</b></td> <td><b>4- Ambient Temperature</b></td> <td><b>stored on pallets in racks</b></td> </tr> </tbody> </table>				Container	Pressure	Temperature	Storage Location	<b>K- Box</b>	<b>1- Ambient pressure</b>	<b>4- Ambient Temperature</b>	<b>stored on pallets in racks</b>	<b>D- Steel drum</b>	<b>1- Ambient pressure</b>	<b>4- Ambient Temperature</b>	<b>stored on pallets in racks</b>
Container	Pressure	Temperature	Storage Location												
<b>K- Box</b>	<b>1- Ambient pressure</b>	<b>4- Ambient Temperature</b>	<b>stored on pallets in racks</b>												
<b>D- Steel drum</b>	<b>1- Ambient pressure</b>	<b>4- Ambient Temperature</b>	<b>stored on pallets in racks</b>												



<p><i>Chemical Description (3)</i></p> <p>CAS: <b>7439-92-1</b></p> <p>Chemical Name: <b>lead (sp)</b></p> <p>EHS: <input checked="" type="checkbox"/></p> <p>EHS Name: <b>Lead</b></p> <p>Check all that apply:</p> <p><input type="checkbox"/> Pure      <input checked="" type="checkbox"/> Solid</p> <p><input checked="" type="checkbox"/> Mix      <input type="checkbox"/> Liquid</p> <p><input type="checkbox"/> Gas</p> <p><input type="checkbox"/> Trade Secret</p>	<p><i>Physical Hazards (4)</i></p> <p>Check all that apply:</p> <p><input type="checkbox"/> Flammable (gases, aerosols, liquids, or solids)</p> <p><input type="checkbox"/> Gas under pressure</p> <p><input type="checkbox"/> Explosive</p> <p><input type="checkbox"/> Self-heating</p> <p><input type="checkbox"/> Pyrophoric (liquid or solid)</p> <p><input type="checkbox"/> Pyrophoric Gas</p> <p><input checked="" type="checkbox"/> Corrosive to metal</p> <p><input type="checkbox"/> Oxidizer (liquid, solid, or gas)</p> <p><input type="checkbox"/> Organic peroxide</p> <p><input type="checkbox"/> Self-reactive</p> <p><input type="checkbox"/> In contact with water emits flammable gas</p> <p><input type="checkbox"/> Combustible Dust</p> <p><input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC)</p>	<p><i>Health Hazards (5)</i></p> <p>Check all that apply:</p> <p><input checked="" type="checkbox"/> Carcinogenicity</p> <p><input type="checkbox"/> Acute toxicity (any route of exposure)</p> <p><input type="checkbox"/> Reproductive toxicity</p> <p><input checked="" type="checkbox"/> Skin Corrosion or Irritation</p> <p><input checked="" type="checkbox"/> Respiratory or Skin Sensitization</p> <p><input checked="" type="checkbox"/> Serious eye damage or eye irritation</p> <p><input type="checkbox"/> Specific target organ toxicity (single or repeated exposure)</p> <p><input type="checkbox"/> Aspiration Hazard</p> <p><input type="checkbox"/> Germ cell mutagenicity</p> <p><input type="checkbox"/> Simple Asphyxiant</p> <p><input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC)</p>	<p><i>Inventory (6)</i></p> <p>Max Daily Amount: <b>10</b></p> <p>Actual Max Daily Amount (lbs): <b>209716</b></p> <p>Avg. Daily Amount: <b>9</b></p> <p>Actual Avg. Daily Amount (lbs): <b>98423</b></p> <p>No. of Days on Site Per Year: <b>365</b></p>												
<p><i>Storage Codes and Locations (7)</i></p> <table border="0"> <thead> <tr> <th>Container</th> <th>Pressure</th> <th>Temperature</th> <th>Storage Location</th> </tr> </thead> <tbody> <tr> <td><b>R- Other</b></td> <td><b>1- Ambient pressure</b></td> <td><b>4- Ambient Temperature</b></td> <td><b>stored on pallets in racks</b></td> </tr> <tr> <td><b>R- Other</b></td> <td><b>1- Ambient pressure</b></td> <td><b>4- Ambient Temperature</b></td> <td><b>in use Forklift batteries</b></td> </tr> </tbody> </table>				Container	Pressure	Temperature	Storage Location	<b>R- Other</b>	<b>1- Ambient pressure</b>	<b>4- Ambient Temperature</b>	<b>stored on pallets in racks</b>	<b>R- Other</b>	<b>1- Ambient pressure</b>	<b>4- Ambient Temperature</b>	<b>in use Forklift batteries</b>
Container	Pressure	Temperature	Storage Location												
<b>R- Other</b>	<b>1- Ambient pressure</b>	<b>4- Ambient Temperature</b>	<b>stored on pallets in racks</b>												
<b>R- Other</b>	<b>1- Ambient pressure</b>	<b>4- Ambient Temperature</b>	<b>in use Forklift batteries</b>												



# CERTIFICATE OF LIABILITY INSURANCE

Page 1 of 2

DATE (MM/DD/YYYY)  
09/05/2019

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

<b>PRODUCER</b> Willis Towers Watson Southeast, Inc. fka Willis of Tennessee, Inc. c/o 26 Century Blvd P.O. Box 305191 Nashville, TN 372305191 USA		<b>CONTACT NAME:</b> Willis Towers Watson Certificate Center <b>PHONE (A/C, No, Ext):</b> 1-877-945-7378 <b>FAX (A/C, No):</b> 1-888-467-2378 <b>E-MAIL ADDRESS:</b> certificates@willis.com	
<b>INSURED</b> Battery Solutions, LLC 4930 Holtz Drive Wixom, MI 48393		<b>INSURER(S) AFFORDING COVERAGE</b> <b>INSURER A:</b> AIG Property Casualty Company <b>INSURER B:</b> <b>INSURER C:</b> <b>INSURER D:</b> <b>INSURER E:</b> <b>INSURER F:</b>	
		<b>NAIC #</b> 19402	

**COVERAGES**

CERTIFICATE NUMBER: W12499473

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDITIONAL INSURED	SUBROGATION WAIVED	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR  GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input checked="" type="checkbox"/> PROJECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER:	Y	Y	EG 13570713	09/01/2019	09/01/2020	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 300,000 MED EXP (Any one person) \$ 25,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000 Employee Ben. Liabil \$ 1,000,000
A	<input checked="" type="checkbox"/> AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY			CA 1904355	09/01/2019	09/01/2020	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
A	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input checked="" type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> DED <input type="checkbox"/> RETENTION \$	Y		EGU 13570715	09/01/2019	09/01/2020	EACH OCCURRENCE \$ 15,000,000 AGGREGATE \$ 15,000,000 \$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N <input type="checkbox"/>	N/A				PER STATUTE <input type="checkbox"/> OTH-ER <input type="checkbox"/> E.L. EACH ACCIDENT \$ E.L. DISEASE - EA EMPLOYEE \$ E.L. DISEASE - POLICY LIMIT \$


DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

RE: Mesa Facility 618 East Auto Center Drive Suite #111 Mesa, AZ 85204

General Liability limits includes Pollution Legal Liability on a claims made basis with \$1,000,000 each loss limit Subject to the terms, conditions, and endorsements of the policy(ies) listed above.

Auto Liability: Subject to all of the terms, conditions, endorsements, and definitions of the above referenced

**CERTIFICATE HOLDER****CANCELLATION**

Metro East Valley Holdings, LLC c/o Metro Commercial Properties, Inc. Attn: Property Manager-MEVCC 1230 W. Washington St., Ste. 203 Tempe, AZ 85281	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.  AUTHORIZED REPRESENTATIVE 
---	---

© 1988-2016 ACORD CORPORATION. All rights reserved.

ACORD 25 (2016/03)

The ACORD name and logo are registered marks of ACORD

SR ID: 18472159

BATCH: 1355451

AGENCY CUSTOMER ID: \_\_\_\_\_  
LOC #: \_\_\_\_\_



## ADDITIONAL REMARKS SCHEDULE

Page 2 of 2

AGENCY Willis Towers Watson Southeast, Inc. fka Willis of Tennessee, Inc.		NAMED INSURED Battery Solutions, LLC 4930 Holtz Drive Wixom, MI 48393	
POLICY NUMBER See Page 1		EFFECTIVE DATE: See Page 1	
CARRIER See Page 1	NAIC CODE See Page 1		

### ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,

FORM NUMBER: 25 FORM TITLE: Certificate of Liability Insurance

policy(ies) as issued by the carrier(s).

Excess Liability limits include Pollution Legal Liability on a claims made basis with \$15,000,000 each occurrence / \$15,000,000 Aggregate limits

Excess Liability: Subject to all of the terms, conditions, endorsements, and definitions of the above referenced policy(ies) as issued by the carrier(s).

Metro Commercial Properties, Inc., Metro East Valley Commerce, LLC, Metro East Valley REIT, LLC, Principal Enhanced Property Fund GP, L.P., and Principal Real Estate Investors, LLC are included as Additional Insureds with respects to the General Liability as required by written contract.

Waiver of Subrogation applies in favor of Additional Insured with respects to General Liability as required by written contract.

The Umbrella/Excess policy Follows Form.



# CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

06/12/19

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

**PRODUCER**  
Aon Risk Services, Inc of Florida  
1001 Brickell Bay Drive, Suite #1100  
Miami, FL 33131-4937

**CONTACT**  
**NAME:** Aon Risk Services, Inc of Florida  
**PHONE**  
(A/C, No, Ext): 800-743-8130 **FAX**  
(A/C, No): 800-522-7514

**EMAIL**  
**ADDRESS:** ADP.COI.Center@Aon.com

**INSURER(S) AFFORDING COVERAGE**

**NAIC #**

**INSURER A :** New Hampshire Ins Co

23841

**INSURED**  
ADP TotalSource NH XXVIII, Inc.  
10200 Sunset Drive  
Miami, FL 33173  
L/C/F  
Battery Solutions, LLC  
4930 Holtz Drive,  
Wixom, MI 48393

**INSURER B :**

**INSURER C :**

**INSURER D :**

**INSURER E :**

**INSURER F :**

## COVERAGES

**CERTIFICATE NUMBER:** 2340738

**REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS. LIMITS SHOWN ARE AS REQUESTED

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
	COMMERCIAL GENERAL LIABILITY						EACH OCCURRENCE
	<input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> OCCUR						DAMAGE TO RENTED PREMISES (Ea occurrence)
							MED EXP (Any one person)
							PERSONAL & ADV INJURY
	GEN'L AGGREGATE LIMIT APPLIES PER:						GENERAL AGGREGATE
	<input type="checkbox"/> POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC						PRODUCTS - COMP/OP AGG
	<input type="checkbox"/> OTHER						
	AUTOMOBILE LIABILITY						COMBINED SINGLE LIMIT (Ea accident)
	<input type="checkbox"/> ANY AUTO OWNED AUTOS ONLY						BODILY INJURY (Per person)
	<input type="checkbox"/> SCHEDULED AUTOS						BODILY INJURY (Per accident)
	<input type="checkbox"/> HIRED AUTOS ONLY						PROPERTY DAMAGE (Per accident)
	<input type="checkbox"/> NON-OWNED AUTOS ONLY						
	UMBRELLA LIAB						EACH OCCURRENCE
	<input type="checkbox"/> OCCUR						AGGREGATE
	EXCESS LIAB						
	<input type="checkbox"/> CLAIMS-MADE						
	DEC						
	RETENTION \$						
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY			WC 080372818 AZ	7/1/2019	7/1/2020	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH)	Y / N	N / A				E.L. EACH ACCIDENT
	If yes, describe under DESCRIPTION OF OPERATIONS below						E.L. DISEASE - EA EMPLOYEE
							E.L. DISEASE - POLICY LIMIT

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)  
All worksite employees working for BATTERY SOLUTIONS, LLC, paid under ADP TOTALSOURCE, INC's payroll, are covered under the above stated policy.

## CERTIFICATE HOLDER

## CANCELLATION

Battery Solutions, LLC  
4930 Holtz Dr.  
Wixom, MI 48393

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

*Aon Risk Services, Inc of Florida*

© 1988-2015 ACORD CORPORATION. All rights reserved.



# CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

06/12/19

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

**PRODUCER**  
Aon Risk Services, Inc of Florida  
1001 Brickell Bay Drive, Suite #1100  
Miami, FL 33131-4937

**CONTACT**  
NAME: Aon Risk Services, Inc of Florida  
PHONE (A/C, No, Ext): 800-743-8130 FAX (A/C, No): 800-522-7514

EMAIL ADDRESS: ADP.COI.Center@Aon.com

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER A : New Hampshire Ins Co	23841

**INSURED**  
ADP TotalSource NH XXVIII, Inc.  
10200 Sunset Drive  
Miami, FL 33173  
ALTERNATE EMPLOYER  
Battery Solutions, LLC  
4930 Holtz Drive,  
Wixom, MI 48393

INSURER B :

INSURER C :

INSURER D :

INSURER E :

INSURER F :

**COVERAGES**

CERTIFICATE NUMBER: 2316315

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS. LIMITS SHOWN ARE AS REQUESTED.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
	COMMERCIAL GENERAL LIABILITY						EACH OCCURRENCE \$
	<input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> OCCUR						DAMAGE TO RENTED PREMISES (Ea occurrence) \$
							MED EXP (Any one person) \$
							PERSONAL & ADV INJURY \$
	GEN'L AGGREGATE LIMIT APPLIES PER:						GENERAL AGGREGATE \$
	<input type="checkbox"/> POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC						PRODUCTS - COMP/OP AGG \$
	<input type="checkbox"/> OTHER						\$
	AUTOMOBILE LIABILITY						COMBINED SINGLE LIMIT (Ea accident) \$
	<input type="checkbox"/> ANY AUTO OWNED AUTOS ONLY						BODILY INJURY (Per person) \$
	<input type="checkbox"/> SCHEDULED AUTOS						BODILY INJURY (Per accident) \$
	<input type="checkbox"/> HIRED AUTOS ONLY						PROPERTY DAMAGE (Per accident) \$
	<input type="checkbox"/> NON-OWNED AUTOS ONLY						\$
	UMBRELLA LIAB						EACH OCCURRENCE \$
	<input type="checkbox"/> OCCUR						AGGREGATE \$
	EXCESS LIAB						
	<input type="checkbox"/> CLAIMS-MADE						
	DEC <input type="checkbox"/> RETENTION \$						
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY			WC 080371943 MI	7/1/2019	7/1/2020	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH)	Y / N <input type="checkbox"/>	N / A				E.L. EACH ACCIDENT \$ 2,000,000
	If yes, describe under DESCRIPTION OF OPERATIONS below						E.L. DISEASE - EA EMPLOYEE \$ 2,000,000
							E.L. DISEASE - POLICY LIMIT \$ 2,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

All worksite employees working for BATTERY SOLUTIONS, LLC, paid under ADP TOTALSOURCE, INC.'s payroll, are covered under the above stated policy. BATTERY SOLUTIONS, LLC is an alternate employer under this policy.

**CERTIFICATE HOLDER****CANCELLATION**

Battery Solutions, LLC  
4930 Holtz Dr.  
Wixom, MI 48393

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

*Aon Risk Services, Inc of Florida*

© 1988-2015 ACORD CORPORATION. All rights reserved.



**Corporate Office**

4930 Holtz Drive  
Wixom, MI 48393  
800.852.8127

**West Coast Office**

618 Auto Center Drive, Suite 111  
Mesa, AZ 85204  
[customerservice@batterysolutions.com](mailto:customerservice@batterysolutions.com)

## Confirmation of Reclamation

Generator:

Generator EPA ID Number:

Date of Receipt:

Shipping Document Number:

Customer PO/Ref. Number:

Description of Material:

Total Weight:

Battery Solutions' EPA ID: MIK-241-575-671

This document confirms that the above described material has been received and is in the process for reclamation. The material is being recycled in compliance with all applicable federal, state and local laws and regulations.

Authorized Signature

Doug Smith

Director, Commercial Sales Support, Battery Solutions

Date: 1/07/2019

A handwritten signature in black ink, appearing to read "Doug Smith", written over a horizontal line.

## Confirmation of Reclamation

Generator:

Generator EPA ID Number:

Date of Receipt:

Shipping Document Number:

Customer PO/Ref. Number:

Description of Material:

Total Weight:

Battery Solutions' EPA ID: AZR-000-519-256

This document confirms that the above described material has been received and is in the process for reclamation. The material is being recycled in compliance with all applicable federal, state and local laws and regulations.

Authorized Signature

Doug Smith

Director, Commercial Sales Support, Battery Solutions

Date: 2/21/2017



To Whom it may concern,

RE: NOV/CP Assessment / DOT/FRA

Battery Solutions LLC recently received final assessment for a civil penalty stemming from a February 12, 2018 incident.

The penalty was assessed by the U.S. Department of Transportation Federal Railroad administration (FRA).

FRA Number: ZBYS-2018-1(HMT)

Battery Solutions Shipped a sea container of lithium Ion cells to Korea, and in transit, a drum on the container smoked and had a thermal runaway event, caused one drum of material to burn. The container was held in transit in the railyard in Long Beach, CA. Battery Solutions Staff and senior management immediately flew to California and assisted the DOT and FRA in the cleanup of the drum and repackaging of the material. A Violation was issued for "lack of terminal protection", asses by the FRA agent – for batteries already protected by design (inset terminals and inner device). Battery Solutions contends that there was no evidence to suggest incident was caused by lack of terminal protection, rather likely a manufacturer defect in a cell. Battery Solutions accepted the fine without admitting guilt (\$3500). A Second NOV was issued for an incorrect label left on the drum (\$500) that was not properly removed from the drum before reuse for shipping lithium Ion. Battery Solutions accepted the violation. Final Penalty reads as follows:

Having considered the materials attached to FRA's Notice of Probable Violation issued on February 12, 2018, and the response made by respondent's representative, the Assistant Chief Counsel for Safety finds that respondent knowingly committed an act (or acts) in violation of the Hazardous Materials Regulations as alleged in the Notice. A person acts "knowingly" within the meaning of the hazardous materials transportation laws when that person has actual knowledge of the facts giving rise to the violation or if a reasonable person acting in the circumstances and exercising due care would have such knowledge. 49 U.S.C. § 5123(a). Consequently, in issuing this Order, the Assistant Chief Counsel for Safety was not required to find that respondent had actual knowledge of the facts specified in the Notice of Probable Violation. Payment of the amount assessed does not constitute agreement by respondent with the finding(s) made and entered by the Assistant Chief Counsel for Safety, nor does it constitute an admission by respondent that any violation has occurred. Specifically, respondent does not agree that it violated the Hazardous Materials Regulations as alleged in the Notice.

The Assistant Chief Counsel for Safety has taken into account the factors specified in 49 C.F.R. § 209.119 in making this assessment.

The Assistant Chief Counsel for Safety, under authority of 49 C.F.R. § 209.111, assesses respondent **\$4,000** for the violations of the Hazardous Materials Regulations specified in the above case.

The final Violation fine was paid, and corrective actions implemented s necessary, the FRA was also provided documentation regarding the corrective actions as well. Details on page 2.

Details of Alleged violations:

*Alleged Violation 1:*

*The first Alleged Violation alleges that Battery Solutions failed to properly protect the lithium batteries within the drum. We believe that the measures used to protect the cells and batteries in the package are consistent with the requirements of 49 CFR §173.185 and 49 CFR §173.24.*

*Alleged Violation 2:*

*The second Alleged Violation alleges that Battery Solutions failed to remove or cover a waste label that misrepresented the contents of the package. This hazardous waste label, which stated the drum contained lead acid batteries, was inadvertently left on the package from a previous shipment. Battery Solutions acknowledges this mistake and, has taken corrective actions to prevent this scenario from happening again. These corrective actions include a revision of our standard operating procedures and further instructions to employees on how to recognize inappropriate marks or labels on packages.*

Further Questions:

Contact Tom Edwards – Quality, EHS Manager, Battery Solutions LLC 248-446-5633 O / 517-294-6330 C

[tom@batterysolutions.com](mailto:tom@batterysolutions.com)



U.S. Department  
of Transportation  
**Federal Motor  
Carrier Safety  
Administration**

1200 New Jersey Ave., S.E.  
Washington, DC 20590  
September 3, 2019

In reply refer to:  
USDOT No.: 2407305

STEPHANIE ZEMAITIS  
DIRECTOR  
BATTERY SOLUTIONS LLC  
4930 HOLTZ DR  
WIXOM, MI 48393

### **Safety Audit Pass**

This letter is to inform you that, based on the results of the safety audit conducted on BATTERY SOLUTIONS LLC on August 28, 2019, the Federal Motor Carrier Safety Administration (FMCSA) has determined that BATTERY SOLUTIONS LLC may continue to operate in interstate commerce within the United States.

However, for-hire motor carriers cannot operate in interstate commerce unless they obtain operating authority from FMCSA by following the registration procedures described in 49 CFR part 365, unless providing transportation exempt from 49 CFR part 356 registration requirements.

You are reminded that as a new entrant motor carrier FMCSA will continue to monitor and evaluate BATTERY SOLUTIONS LLC's safety management practices and on-road performance to ensure BATTERY SOLUTIONS LLC is complying with Federal requirements including the Federal Motor Carrier Safety Regulations (FMCSRs) and applicable Federal Hazardous Materials Regulations (HMRs). BATTERY SOLUTIONS LLC may be granted permanent registration no earlier than 18 months from the date its USDOT New Entrant registration was originally granted. Failure to comply with applicable requirements may result in the revocation of BATTERY SOLUTIONS LLC's USDOT New Entrant or permanent registration.

If you have any questions concerning your New Entrant Status, please call your division office number (202) 366-4023.

Sincerely,

Joseph P. DeLorenzo, Director, Office of  
Enforcement and Compliance



Attachment to Battery Solutions Standard Audit packet:

***Battery Solutions LLC's official policies on the following:***

**Work performed by children:**

*Battery Solutions LLC.* takes its responsibilities as an employer very seriously to uphold all applicable labor laws.

To this end *Battery Solutions LLC.* does not, and will not, employ children in any capacity which does not fully comply with all applicable State, Federal, and International laws that *Battery Solutions LLC.* is bound to by law and subscribes to voluntarily.

*Battery Solutions LLC.* will not use the services in any capacity of any business does not abide by the laws.

It is the policy of *Battery Solutions LLC.* to not hire anyone less than 18 years of age.

**Prison Labor:**

It is the policy of Battery Solutions LLC. to not to use prison labor of any kind.

All employees, including contractors and temporary workers have had their age, citizenship and legal status verified before they are allowed to begin work at our facility.

Approved by: \_\_\_\_\_

Tom Edwards, Quality and EHS manager; Battery Solutions LLC.

Date: 8/29/2018

## Quality, Environmental, Health & Safety Policy

The management team of Battery Solutions, LLC ("Battery Solutions") is committed to ensuring that our Quality, Environmental, Health & Safety Policy provides a safe workplace for all our employees and visitors by complying with all applicable environmental and occupational health and safety laws and regulations while seeking sustainable technologies and practices as our business grows. Battery Solutions is committed to prevention of pollution and workplace injuries.

Our Quality, Environmental, Health & Safety objectives are:

- Complying with all applicable federal, state and local environmental health & safety laws, including to never dispose of universal waste batteries, electronics, regulated or hazardous waste in landfills or trash incineration.
- Complying with customer and product requirements and other quality, environmental, health and safety requirements.
- Maintaining of our R2/RIOS™ certification.
- Contributing to the circular economy in all our practices.
- Striving to meet or exceed expectations and industry best practices while delivering exceptional performance to our clients, business partners, investors and the community.
- Emphasizing our culture of continuous improvement and lean performance.
- Continually reviewing and improving procedures and systems to maximize efficiency and enhance quality and to provide a framework for establishing quality, environmental, health and safety goals.
- Creating and maintaining an encouraging work atmosphere promoting leadership, collaboration, problem solving and innovative thinking.

All employees are aware, and understand both the letter, and intent of this policy, as well as understand their responsibilities as it relates to quality, environmental compliance, and safe management of the material in our custody.



---

Thomas Bjarnemark, CEO



---

Jeff Weber , Warehouse Operations - MI



---

Adam Hancock, BSR Operations Mgr. - MI



---

Scott Sidum, Warehouse Operations - AZ

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

September 28, 2018

**PERMIT TO INSTALL**  
248-09B


**ISSUED TO**  
Battery Solutions Recovery, LLC

**LOCATED AT**  
4930 Holtz Drive  
Wixom, Michigan

**IN THE COUNTY OF**  
Oakland

**STATE REGISTRATION NUMBER**  
P0945

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: <b>August 15, 2018</b>	
DATE PERMIT TO INSTALL APPROVED: <b>September 28, 2018</b>	SIGNATURE: 
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:



Malfunction Abatement Plan  
EUALKALINE  
Baghouse Dust Collector  
for  
Battery Solutions Recovery, LLC  
4930 Holtz Drive  
Wixom, Michigan

Project No. 190350  
March 2019



Fishbeck, Thompson, Carr & Huber, Inc.  
engineers | scientists | architects | constructors

ftc&h

**Malfunction Abatement Plan  
EUALKALINE  
Baghouse Dust Collector  
for  
Battery Solutions Recovery, LLC  
4930 Holtz Drive  
Wixom, Michigan**

**March 21, 2019  
Project No. 190350**

## Table of Contents

1.0	Introduction.....	1
2.0	Defining Malfunctions .....	1
3.0	Source Description .....	2
4.0	Emission Control Device .....	2
5.0	Responsible Personnel .....	2
6.0	Preventative Maintenance Program, Operational Variables, and Corrective Procedures .....	3
6.1	Items Inspected and Operational Variables .....	3
6.2	Common Control System Malfunctions and Corrective Actions.....	3
6.3	Preventive Maintenance Records .....	3
7.0	Major Parts Kept Onsite for Quick Replacement .....	4
8.0	Reporting Malfunctions and Abnormal Conditions.....	4

## List of Figures

Figure 1 Process Diagram

## List of Tables

Table 1 – Source Description .....	2
Table 2 – Responsible Personnel.....	2
Table 3 – Inspection Table and Operational Variables.....	3

## List of Appendices

Appendix 1 Internal Corrective Action Report  
Appendix 2 Inspection Forms  
Appendix 3 Delta New JETLINE CH-V2 Instruction Manual

## List of Abbreviations/Acronyms

EU	Emission Unit
HAPs	hazardous air pollutants
MAP	Malfunction Abatement Plan
MDEQ	Michigan Department of Environmental Quality
mg/m <sup>3</sup>	milligrams per cubic meter
N/A	Not Applicable
PLC	Programmable Logic Controller
PM	Particulate Matter
PMs	Preventative Maintenance
PTI	Permit to Install
TACs	toxic air contaminant
VE	Visible emissions





***Temporary Certificate of Occupancy  
(Expires May 31, 2019)***

December 28, 2018

Brivar Construction Company  
7258 Kensington Road  
Brighton, MI 48116

This is to inform you that the work specified for the industrial building and attached office construction at 4930 Holtz Drive, Milford, 48381, building permit PB180068, and has been completed according to code. The final inspection was scheduled and completed on December 27, 2018.

Milford Township has approved a temporary occupancy for 150 days pending:

1. Completion of asphalt top coat.
2. Correction of entry doors latch side clearance.
3. Installation of soap dispensers in all lavatory rooms
4. Permanent bollards outside man doors
5. 42" Guardrails in the mezzanine area of the shop
6. Sanitary base installed in the lavatory rooms, locker rooms, janitor's closet and where required by code.
7. Completion of landscaping and sprinkler system.
8. Final Engineering approval
9. As-Builts approved by Township engineers.

If you have any questions please contact our Milford Township office for clarification, (248) 685-8731.

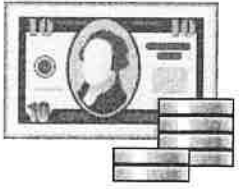
Thank you,

*Timothy Brandt*

Timothy C. Brandt  
Building Official

**Donald D. Green, Supervisor**  
**Holly Brandt, Clerk**  
**Cynthia Dagenhardt, Treasurer**

**Randal K. Busick, Trustee**  
**Brien R. Worrell, Trustee**  
**William E. Mazzara, Trustee**  
**Dale R. Wiltse, Trustee**



# MILFORD TOWNSHIP

1100 ATLANTIC

MILFORD, MI 48381

Ph: 2486858731

Fax: 2486859236

12/28/2018

EXT. RECEIPT NUMBER

**18269**

## Paid By

Brivar Construction Company

7258 Kensington Road

Brighton, MI 48116

Type	Record	Property Address	Amount
Permit	PB180068	4930 HOLTZ DR	

## Total

Cash

Ck Num: 4001106

Check

\$ 135,000.00

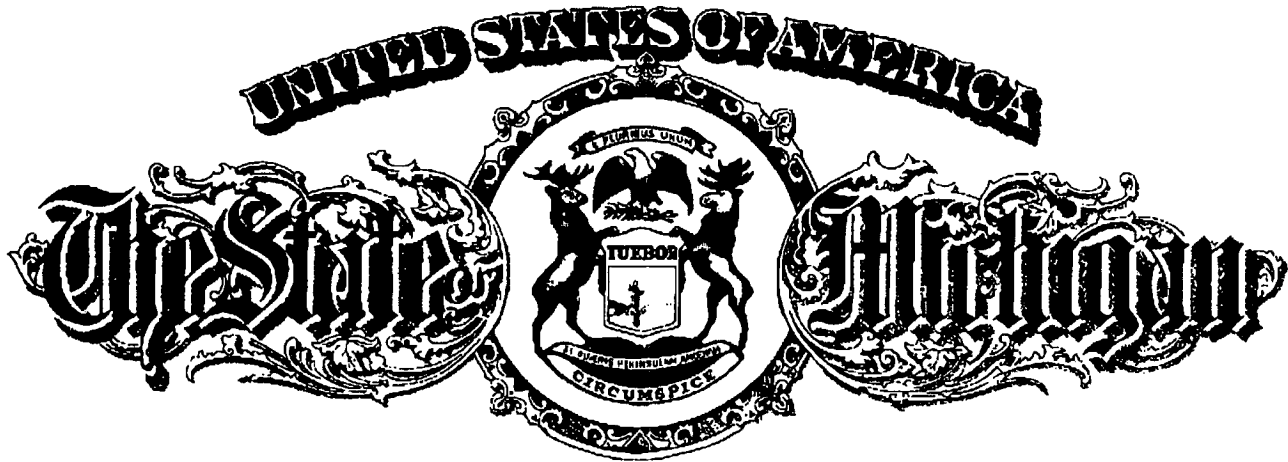
Credit

Transferred

**Tendered \$**

**Change**

**To Overpayment**



## Department of Licensing and Regulatory Affairs

Lansing, Michigan

*This is to Certify That*

### **BATTERY SOLUTIONS, LLC**

*a limited liability company existing under the laws of the State of DELAWARE was validly authorized to transact business in Michigan under the qualifying assumed name of*

### **BATTERY SI, LLC**

*the 13th day of December, 2012, in conformity 1993 PA 23.*

*The company is hereby authorized to transact in this state any business of the character set forth in its application which a domestic company formed under this act may lawfully conduct.*

*This authority shall continue as long as the company retains its authority to transact business in the jurisdiction of its organization; its authority to transact business in this state has not been withdrawn.*

*Pursuant to the provisions of 1993 PA 23, MCL 450.4204(3), the company shall use the assumed name in all its dealings with this Department and in the transaction of business in this state.*

*This certificate is in due form, made by me as the proper officer, and is entitled to have full faith and credit given it in every court and office within the United States*



Sent by Facsimile Transmission  
D9169A

*In testimony whereof, I have hereunto set my hand, in the City of Lansing, this 13th day of December, 2012.*

Director

Bureau of Commercial Services

# Delaware

PAGE 1

*The First State*

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "BATTERY SOLUTIONS, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE SEVENTH DAY OF DECEMBER, A.D. 2012.

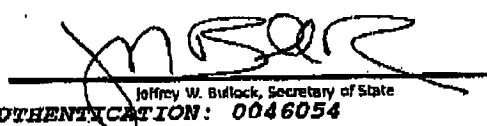
AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE NOT BEEN ASSESSED TO DATE.



5246017 8300

121311018

You may verify this certificate online  
at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

  
Jeffrey W. Bullock, Secretary of State  
AUTHENTICATION: 0046054

DATE: 12-07-12

12/13/2012 12:01PM (GMT-05:00)