

# Call2Recycle, Inc.

Changing habits. Inspiring action.™

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

*Submitted by:*

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Renewal Plan



November 20, 2020

*Submitted to:*

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## I. Introduction

Call2Recycle, Inc., which administers the Call2Recycle® program, is a non-profit, public service organization. Since 2016, on behalf of obligated primary battery producers, Call2Recycle has been managing a primary battery collection and recycling program in Vermont under its approved Battery Stewardship Plan. Pursuant to Section §7586 (g) of the [Legislation](#), Call2Recycle, Inc. is submitting its renewal plan to the Vermont Agency of Natural Resources.

Call2Recycle's renewal plan builds and learns from the past 4+ years of operating the primary battery stewardship program in Vermont. With the participation of municipalities, retailers, businesses, manufacturers, and Vermont residents, Vermonters now recycle the most consumer batteries per capita in the United States. Despite this accolade, Call2Recycle acknowledges the need for continuous improvement. For example, the Vermont Department of Environmental Conservation's *2018 Vermont Waste Characterization* report indicates primary batteries are still significantly found in Vermont's waste stream. Based on these findings, coupled with the uncertainty that COVID-19 has created, Call2Recycle's renewal plan highlights the transformation its collection and outreach strategies will take to successfully grow the program over the next five years.

With the unpredictable path of COVID-19, recovery to normal recycling behavior is uncertain; however, Call2Recycle is well-prepared and committed to pivot and adapt its program amidst a global pandemic. Fundamental to this commitment is a significant investment to bolster outreach and bring battery collection directly to Vermont residents 'at home'. Below you will find a table that summarizes the impact of COVID-19 on battery collections and how Call2Recycle is working to address them:

Area of Concern	Trends	Solutions
<b>Economic Conditions/Consumer Spending</b>	Consumers have cut back on most of their purchases, except for General Merchandise & Grocery (Big Box, Grocery and Wholesale). This means consumers will make less trips to specialty brick-and-mortar retailers (many of whom serve as battery collection sites) and therefore, potential for a decline in battery collection at retail.	Diversifying how and where batteries are collected is a key component of the plan.
<b>Safety</b>	In addition to managing battery safety risks, collection sites must now also focus on their worker and customer safety. Along with securing and maintaining PPE supplies, many are implementing 'low touch or no touch' changes to recycling programs, such as limiting or abandoning collection events, implementing comprehensive collection protocols, etc.	Exploring opportunities to support collection sites' safety practices while still offering battery collection and recycling are included in the plan.
<b>Convenience</b>	COVID-19 is accelerating the shift to consumers taking advantage of modern conveniences like online shopping and grocery and food delivery.	The plan addresses how battery collection and recycling will also evolve to no longer solely rely on consumers to take their batteries somewhere.
<b>Demographics</b>	All age segments - particularly older shoppers - are now shopping more online.	Educating and motivating consumers of all ages to recycle will require a more diverse and intricate Education and Outreach strategy, including maximizing digital, which is addressed in the plan.
<b>Reliance on Batteries and/or Cordless Devices</b>	With more people working from home and kids moving to remote-based learning, the reliance on technology and batteries to power those devices is expected to also increase.	The plan includes opportunities to reach students and parents to ensure batteries are responsibly recycled at their end of life.

## A. Vermont Primary Battery Law

The Vermont Primary Battery Law required, 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
    1. Provide, at a minimum, no fewer than two collection facilities in each county that provide collection throughout the year
    2. 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.

## 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

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### A. Statutory Citation

*10 V.S.A. § 7581. DEFINITION*

*(1)“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 non-profit 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 the Rechargeable Battery Recycling Corporation (RBRC), Call2Recycle is North America’s first and largest consumer battery stewardship program, collecting used primary and rechargeable batteries, as well as used cellphones. The Call2Recycle program has operated in Vermont since its collection program launched in 1996.

Call2Recycle, Inc., is led by an experienced [Executive Management Team](#) and operates under the direction of a [Board of Directors](#).

### 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

Twenty-three (23) battery producers, representing over 85 brands, have partnered with Call2Recycle, Inc. to comply with Vermont’s primary battery stewardship law. These producers finance primary battery collection and recycling in Vermont by paying fees based on the total weight of primary batteries sold into the state.

On a quarterly basis, obligated primary battery producers are required to 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 producers, as well as their brands and contact information, partnering with Call2Recycle to comply with the Vermont primary battery stewardship law can be found below:

Name	Brands	Address	Contact Information
Ace Hardware Corporation	ACE	2200 Kensington Court Oak Brook, IL 60523	Leigh Levinson 866.290.5334
Amazon.com	Amazon Basics	410 Terry Avenue North Seattle, WA 98109	Heather Zakour 206.266.1000
Best Buy Co., Inc	Insignia	7601 Penn Ave S Minneapolis, MN 55423-3683	Tim Dunn 888.237.8289
Delhaize America	Home 360	2110 Executive Dr. Salisbury, NC 28147	George Parmenter 800.442.6049
Do It Best	Do It Best	6502 Nelson Rd Fort Wayne, IN 46803	Steve Markley 260.748.5300
Dollar General	DG Home	100 Mission Ridge Goodlettsville, TN 37072	Eric Voyles 615.855.4000

Duracell US Operations	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	14 Research Dr Luanne Lombardo Bethel, CT 06801-1040	Richard Abramowitz 203.796.4000
Energizer Battery Manufacturing, Inc	Energizer, Energizer Max, Energizer Ultimate, Energizer eco advanced, Energizer advanced, Energizer Industrial, Eveready, Eveready Gold, Eveready Super Heavy Duty, Rayovac, Fusion, Rayovac Hybrid, Rayovac I-C3, Rayovac Platinum, Rayovac Renewal, Rayovac Ultra Cordless, Rayovac Ultra Pro	25225 Detroit Rd Westlake, OH 44145	Marc Boolish 800.383.7323
Family Dollar Stores of Vermont, Inc.	Family Dollar	P.O. Box 1017, Charlotte, NC 28201	Camille Charbonnet 844.636.7687
HD Supply Holdings, Inc.	HD Supply	3400 Cumberland Blvd SE Atlanta, GA 30339-5940	Armando Diaz 770.852.9000
Harbor Freight Tools USA, Inc.	Gordon, Bauer, Braun, Chicago Electric, DrillMaster, Luminar Work, Luminar Outdoor, Thunderbolt, Gen-Tech, Viking, Hercules, Earthquake XT	26541 Agoura Rd Calabasas, CA 91302-2093	Tim Delaney 805.388.1000
Interstate Batteries Recycling, LLC	Interstate, Workaholic, PowerVolt, Power Patrol	12770 Merit Drive Dallas, TX 75251	Tod Lyons 888.772.3600
L'Image Home Products, Inc.	Sunbeam	1175 Place Du Frère-André Montréal, QC H3B 3X9	John Benjamin 514.383.4720
Maxell Corporation of America	Maxell, Maxell Gold, Maxell Super Power Ace	3 Garret Mountain Plz Woodland Park, NJ 07424	Bob Meadows 973.653.2400
Panasonic Corporation	Panasonic, Panasonic Pro, Panasonic Evolta	2 Riverfront Plazz Ste 200 Newark, NJ 07102	Kazuhiro Suzuki 201.348.7000
PLR IP Holdings, LLC	Polaroid	4350 Baker Rd Minnetonka, MN 55343	Elizabeth Tucker 800.765.2764
PowerMax Battery USA	Essential Everyday (Shaw's Supermarket), Smart Living (A&P), Tops (Fresh Direct), American Choice, Powermax, AC Delco	11750 Jersey Blvd Rancho Cucamo, CA 91730	Neville Lin 909.945.2111
RiteAid	Rite Aid, Rite Aid Home	30 Hunter Lane Camp Hill, PA 17011	Matthew Boyer 800.748.3243
SureFire LLC	SureFire	18300 Mount Baldy Cir Fountain Valley, CA 92708	Mark Oshiro 800.828.8809
Target Corporation	Up&Up	33 S 6th St Ste CC-3625 Minneapolis, MN 55402	Catherine Wernecke 800.440.0680
Tractor Supply Company	Tractor Supply, JobSmart	200 Powell Pl Brentwood, TN 37027-7514	Brian Spears 877.718.6750
True Value Company	True	8600 W Bryn Mawr Ave Chicago, IL 60631-3579	William Schwab 773.695.5000
Varta Microbattery Inc	Power One, Ecopack, Auditas, Eco Gold, Siemens, Connect Hearing, Audigy, VARTA	555 Theodore Fremd Ave Rye, NY 10580	James Bremner 800.468.2782

## C. Free Collection

With funding from participating producers, Call2Recycle's collection and recycling program will be FREE to Vermont consumers. All primary batteries will be collected for free by the program, and no primary battery can be turned away from the program (even if the battery producer is not participating), assuming it meets the definition of a primary battery outlined in the Legislation, including chemistry and weight. In addition, participation in Call2Recycle as a primary battery collection site (assuming the entity meets the collection site criteria listed in Section IV of this plan) is open to all retailers, municipalities, and other businesses such as solid waste management facilities at no cost as long as the sites meets Call2Recycle's standards, including successfully completing an online safety tutorial. 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 provides a safe, compliant, 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 of these sites. Currently, Call2Recycle has 142 active battery collection sites accepting used batteries from consumers in Vermont.

Call2Recycle's approach to battery collection is designed with user safety, convenience, and flexibility in mind. Call2Recycle provides the necessary collection containers and collateral materials to safely collect batteries, and pays all shipping, sorting, and recycling costs.

Call2Recycle's patented collection and shipping box complies with U.S. EPA Universal Waste, and ships under a U.S. Department of Transportation Special Permit (*Appendix A*) which allows for both rechargeable and primary batteries to be collected, stored, and shipped in the *same* box. In addition, each collection box is sent with a reference guide for terminal protection (*Appendix B*).

Any retailer, business, institution, or government entity which meets the minimum collection requirements outlined below can participate as a private or public collection site:

- 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. In addition, all collection sites are now required to complete an online training video and test before approval.
- Agrees to provide contact information for individual sites.
- Agrees to safely handle and ship batteries in compliance with U.S. DOT regulation.
- Agrees to have a minimum of one staff member complete and pass Call2Recycle’s on-line safety training.

In addition, the below considerations will be included 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, including lithium battery fire prevention.

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 training, via an on-line, mandatory training module, on how to properly accept and package used batteries. Once enrolled, each site receives a minimum of two check-ins per 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.

Call2Recycle supports its customer base by utilizing a centralized fulfillment solution that ships approximately 200,000 battery collection containers annually to 18,000 U.S. collection sites. 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. In addition, information regarding the receipt of non-program and/or non-compliant materials will be captured at this time and can delay shipment of supplies.
- 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.
- Certificates of recycling are available upon request and provide the collector with the weight of batteries recycled based upon chemistry type for the requested time period.

In addition to small volumes, Call2Recycle provides a bulk shipping option for sites with large volumes of batteries to recycle. Bulk shipments can be scheduled by the collection site via Call2Recycle’s online “Bulk Shipment (BOL) Wizard” which assists sites in creating a compliant Bill of Lading and allows for on-line scheduling of a pick-up date from one of Call2Recycle’s approved transporters. 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 online 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 pickup through Call2Recycle's approved transporters. If using the online tool is not an option, Call2Recycle provides a package with detailed instruction on how to properly complete a manual BOL.

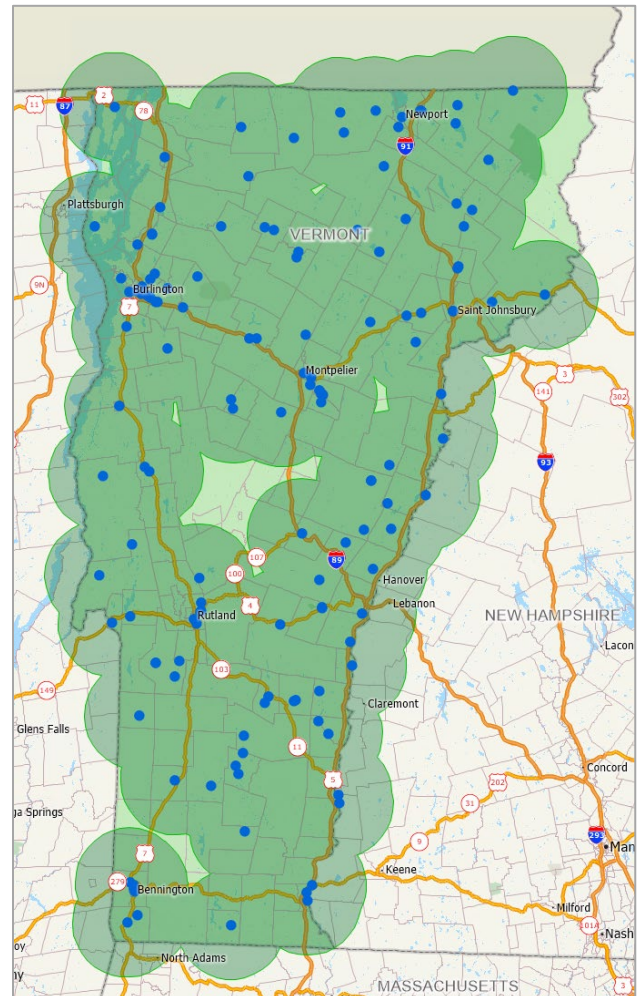
- Bill of lading number can be used to track progress of the shipment until it reaches the final destination.
- Once the shipment is received, Call2Recycle electronically captures all of the supporting documentation related to a specific shipment. In addition, information regarding the receipt of non-program and/or non-compliant materials will be captured at this time and reported back to the site if necessary.
- Certificates of recycling are available upon request and provide the collector with the weight of batteries recycled based upon chemistry type for the requested time period.

Call2Recycle will work with retailers, municipalities, solid waste management entities 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.

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

### C. Convenience

Call2Recycle has serviced the state of Vermont for 26 years with its free battery collection and recycling program. Call2Recycle's current accessibility rate is 98% of Vermonters are within 10 miles of a public collection site. The map to the right (*Figure 1*) depicts the active Call2Recycle collection network:



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

Call2Recycle’s collection network currently meets or exceeds the accessibility requirements of two (2) collection facilities per county as put forth in the law and shown in *Figure 2* below:

County	Required collection facilities open to consumers by law	Call2Recycle collection facilities open to consumers
Addison	2	4
Bennington	2	9
Caledonia	2	10
Chittenden	2	23
Essex	2	4
Franklin	2	5
Grand Isle	2	2
Lamoille	2	5
Orange	2	8
Orleans	2	14
Rutland	2	15
Washington	2	15
Windham	2	10
Windsor	2	18
<b>Total</b>	<b>28</b>	<b>142</b>

Figure 2: Number of collection facilities per county.

In addition, the complete list of Call2Recycle collection sites with name, location and contact information can be found below in *Figures 3 & 4*.

Account Name	Address	County	Contact	Telephone	Consumer drop off?
The UPS Store	105 Court St, Middlebury, VT 05753-1475	Addison	Josh Sherman	(802) 388-3020	Yes
Addison County Solid Waste District	1223 Route 7 S, Middlebury, VT 05753-8800	Addison	Donald Maglienti	(802) 388-2333	Yes
Marble Works Pharmacy	187 Main St, Vergennes, VT 05491-1117	Addison	Patricia Covillon	(802) 877-1190	Yes
Broughton True Value Hardware	3437 VT Route 22A, Bridport, VT 05734-4416	Addison	Monica Bailey	(802) 758-2477	Yes
Bennington Transfer Station	111 South St. Suite 203, Bennington, VT 05201	Bennington	Michael Batchter	(802) 447-8737	Yes
EZ Way Rental Center	115 County St, Bennington, VT 05201-1809	Bennington	Mike Thompson	(802) 442-8393	Yes
The Home Depot	121 N Bennington Rd, Bennington, VT 05201	Bennington	Operations ASM	(802) 447-9997	Yes
Readsboro Transfer Station	301 Phelps Ln, Readsboro, VT 05350-9638	Bennington	Normajean Marchegiani	(802) 423-7010	Yes
Pownal Transfer Station	467 Center St, Pownal, VT 05261-9637	Bennington	Tom Shuey	(802) 379-1470	Yes
Staples	5 Kocher Dr, Bennington, VT 05201-1924	Bennington	Store Manager	(802) 442-3919	Yes
R.K. Miles, Inc	618 Depot St, Manchester Center, VT 05255-9807	Bennington	Zack Dupuis	(802) 362-1952	Yes
Pownal Transfer Station	645 Maple Grove Rd, Pownal, VT 05261	Bennington	Tom Shuey	(802) 379-1470	Yes
Winhall Transfer Station	66 Old Town Rd, Bondville, VT 05340	Bennington	Scott Bushee	(802) 297-2130	Yes
NEKWMD Newark Recycling Ctr	1358 Newark St, West Burke, VT 05871-9733	Caledonia	General Manager	(802) 626-3532	Yes
Larrabee's Building Supply	1410 US-2, West Danville, VT 05873	Caledonia	Jason Larrabee	(802) 684-3622	Yes
Town of Burke	212 School St, West Burke, VT 05871-9009	Caledonia	Linda Corey	(802) 626-9622	Yes
Northeast Kingdom Waste Mgt District	224 Church St, Lyndonville, VT 05851-9616	Caledonia	Shannon Choquette	(802) 626-3532	Yes
NEKWMD - Ryegate Recycling Ctr	269 School St, East Ryegate, VT 05042	Caledonia	General Manager	(802) 626-3532	Yes
NEKWMD Danville Recycling Ctr	279 Highland Ave, Danville, VT 05828-9667	Caledonia	General Manager	(802) 626-3532	Yes
NEKWMD - Waterford Recycling	Duck Pond Rd, Lower Waterford, VT 05819	Caledonia	General Manager	(802) 626-3532	Yes
NEKWMD Barnet Recycling Ctr	End of Town Highway 14, Saint Johnsbury, VT 05819-8590	Caledonia	General Manager	(802) 626-3532	Yes
NEKWMD - Wheelock Recycling	Route 122, Lyndonville, VT 05851-6000	Caledonia	General Manager	(802) 626-3532	Yes
NEKWMD Peacham Recycling Ctr	Town Highway #2, E Peacham, VT	Caledonia	General Manager	(802) 626-3532	Yes

Lowe's	10 Susie Wilson Rd, Essex Junction, VT 05452-2807	Chittenden	Sandy Hunton	(802) 662-9131	Yes
Chittenden Solid Waste District	1011 Airport Pkwy, South Burlington, VT 05403-5804	Chittenden	Joshua Estey	(802) 865-4663	Yes
Bibens Ace Hardware	1127 North Ave, Burlington, VT 05408	Chittenden	Roland Ostrout	(802) 881-0056	Yes
The Radio North Group	12 Gregory Dr Ste 4, South Burlington, VT 05403-6058	Chittenden	Danielle Pheeneey	(802) 865-0090	Yes
Staples	1375 Maple Tree Pl, Williston, VT 05495-8210	Chittenden	Store Manager	(802) 872-0260	Yes
Williston Drop-Off Center	1492 Redmond Rd, Williston, VT 05495-7701	Chittenden	General Manager	(802) 872-7109	Yes
Lowe's	189 Hanneford Dr, South Burlington, VT 05403-6956	Chittenden	Store Manager	(802) 318-9052	Yes
Bibens Ace Hardware	1961 Williston Rd, South Burlington, VT 05403	Chittenden	David Abell	(802) 866-0969	Yes
Essex Drop-Off Center	218 Colchester Rd, Essex Junction, VT 05452-2405	Chittenden	General Manager	(802) 878-3152	Yes
Jerihill Ace Hardware	249 VT Route 15, Jericho, VT 05465-9641	Chittenden	Walt Tummons	(802) 899-1277	Yes
Burlington Drop-Off Center	339 Pine St, Burlington, VT 05401-4739	Chittenden	General Manager	(802) 863-3827	Yes
Milton Drop-Off Center	36 Landfill Rd, Milton, VT 05468-3886	Chittenden	General Manager	(802) 893-6551	Yes
Aubuchon Hardware	47 Hinesburg Rd, South Burlington, VT 05403-6526	Chittenden	Scott Law	(802) 658-4900	Yes
Milton Ace Hardware	5 Southerberry Dr, Milton, VT 05468-4537	Chittenden	Walt Tummons	(802) 893-4100	Yes
Aubuchon Hardware	50 Shelburne Shopping Park, Shelburne, VT 05482-7488	Chittenden	Scott Law	(802) 985-3349	Yes
Shred-Ex, LLC	529 Jasper Mine Rd, Colchester, VT 05446-7526	Chittenden	Cielidh Munrowe	(802) 863-0404	Yes
The Home Depot	759 Harvest Ln, Williston, VT 05495-7269	Chittenden	Store Manager	(802) 872-0039	Yes
Richmond Drop-Off Center	80 Rogers Ln, Richmond, VT 05477-7748	Chittenden	General Manager	(802) 434-2712	Yes
Kinney Drugs Inc	800 Us Rt. 302-Berlin, Barre, VT 05641	Chittenden	Store Manager	(802) 476-6659	Yes
Staples	861 Williston Rd, South Burlington, VT 05403-5724	Chittenden	Store Manager	(802) 862-2199	Yes
South Burlington Drop-Off Ctr	87 Landfill Rd, South Burlington, VT 05403-5702	Chittenden	General Manager	(802) 865-6221	Yes
Russell Supply	9 Gregory Dr, South Burlington, VT 05403-6061	Chittenden	Store Manager	(802) 863-1177	Yes
Hinesburg Drop-Off Center	907 Beecher Hill Rd, Hinesburg, VT 05461-9135	Chittenden	General Manager	(802) 482-4840	Yes
NEKWMD Concord Recycling Ctr	110 Brook Rd, Concord, VT 05824	Essex	General Manager	(802) 626-3532	Yes
NEKWMD Norton Recycling Ctr	249 VT Route 114 S, Norton, VT 05907	Essex	General Manager	(802) 626-3532	Yes
NEKWMD Brighton Recycling Ctr	621 Railroad St, Island Pond, VT 05846-9626	Essex	General Manager	(802) 626-3532	Yes
NEKWMD Lunenburg Recycling Ctr	Transfer Station Rd, Lunenburg, VT 05906	Essex	General Manager	(802) 626-3532	Yes
Green's Ace Hardware	10 Railroad St, Enosburg Falls, VT 05450	Franklin	Tessa Tibbits	(802) 933-7500	Yes
Northwest Vermont SWMD	158 Morse Dr, Fairfax, VT 05454	Franklin	Rich Backer	(802) 524-5986	Yes
NWSWD - Bakersfield	380 Main St Route 108, Bakersfield, VT 05441-9998	Franklin	Rich Backer	(802) 524-5986	Yes
NWSWD - St. Albans City	83 Rewes Dr, Saint Albans, VT 05478-2000	Franklin	General Manager	(802) 524-5986	Yes
NWSWD - Montgomery	86 Mountain Rd, Montgomery Center, VT 05471-3130	Franklin	General Manager	(802) 524-5986	Yes
Alburgh Transfer Station	10 Dump Road, Alburgh, VT 05440	Grand Isle	Danielle Choiniere	(802) 796-6078	Yes
NWSWD - North Hero	362 W Shore Rd, North Hero, VT 05486-4514	Grand Isle	General Manager	(802) 524-5986	Yes
Johnson Hardware and Rental	1442 VT Route 15 W, Johnson, VT 05656-9647	Lamoille	Alan Lehouillier	(802) 635-7282	Yes
Country Home Center	85 Center Rd, Morrisville, VT 05661-8585	Lamoille	Paul Badger	(802) 888-3177	Yes
Cambridge Transfer Sation	Route 104, Cambridge, VT 05444	Lamoille	General Manager	(802) 891-4050	Yes
Morrisville Transfer Station	Trombley Hill Rd, Morrisville, VT 05661	Lamoille	James Gonyaw	(802) 253-9503	Yes
Johnson Transfer Station	Wilson Rd, Johnson, VT 05656-9304	Lamoille	James Gonyaw	(802) 253-9503	Yes
Strafford Recycling Center	159 VT Rte 132, South Strafford, VT 05070-7738	Orange	General Manager	(802) 674-4474	Yes
Tool Barn, Inc	2320 US Route 5 N, Fairlee, VT 05045-9752	Orange	Dan Perry	(802) 222-9311	Yes
NEKWMD Corinth Recycling Ctr	2398 Goose Green Rd, Bradford, VT 05033	Orange	General Manager	(802) 626-3532	Yes
Thetford Recycling Center	4659 Route 113, Thetford Center, VT 05075	Orange	Sally Bugg	(802) 785-2922	Yes
Town of Newbury	4982 Main St N, Newbury, VT 05051-9802	Orange	Claude Phipps	(802) 866-9008	Yes
Vershire Recycling Center	6894 VT Route 113, Vershire, VT 05079-9604	Orange	Gene Craft	(802) 685-2227	Yes
Vershire Town Office	6897 VT Route 113, Vershire, VT 05079	Orange	General Manager	(802) 685-2227	Yes
West Fairlee Town Offices	870 Rte. 113, West Fairlee, VT 05083	Orange	General Manager	(802) 333-9696	Yes
NEKWMD Jay Recycling Ctr	1375 Cross Rd, North Troy, VT 05859-9818	Orleans	General Manager	(802) 626-3532	Yes
NEKWMD Glover Recycling Ctr	1600 Dry Pond Rd, Glover, VT 05839	Orleans	General Manager	(802) 626-3532	Yes
NEKWMD Albany/Irasburg Depot	161 Route 58 E, Irasburg, VT 05845-9666	Orleans	General Manager	(802) 626-3532	Yes
Casella Coventry Landfill/CWM Transportation, Inc.	21 Landfill Ln, Newport, VT 05855-4504	Orleans	Trish Geoffroy	(802) 334-8300	Yes
NEKWMD Morgan Recycling Ctr	285 Hatton Hts, Morgan, VT 05853-9601	Orleans	General Manager	(802) 626-3532	Yes
NEKWMD Holland Recycling Ctr	3157 Valley Rd, Holland, VT 05830	Orleans	General Manager	(802) 626-3532	Yes

NEKWMD Derby Recycling Ctr	3427 US Route 5, Derby, VT 05829	Orleans	General Manager	(802) 626-3532	Yes
Poulin Lumber Inc	3639 US Route 5, Derby, VT 05829-9490	Orleans	Brad Richardson	(802) 766-4971	Yes
The Pick and Shovel	54 Coventry St, Newport, VT 05855-2126	Orleans	Greg Hamblett	(802) 334-8370	Yes
NEKWMD - Westmore Recycling	6988 VT Route 5A, Westfield, VT 05860	Orleans	General Manager	(802) 626-3532	Yes
NEKWMD - Westfield Recycling	757 VT Route 100, Westfield, VT 05874-9666	Orleans	Town Garage	(802) 626-3532	Yes
Craftsbury Transfer Station	Creek Rd, Craftsbury, VT 05826-9528	Orleans	General Manager	(802) 496-6394	Yes
NEKWMD Newport Town Recycling	Rt 105, The Old Town Garage, Newport Town, VT 05857	Orleans	General Manager	(802) 626-3532	Yes
NEKWMD Greensboro Recycling Ct	Town Hwy 8, Greensboro, VT 05841	Orleans	General Manager	(802) 626-3532	Yes
Solid Waste Alliance Communities	10 Park Ave, PO Box 1232, Middletown Springs, VT 05757-4021	Rutland	General Manager	(802) 342-5701	Yes
Solid Waste Alliance Communities	122 School St, Pawlet, VT 05761-9435	Rutland	Deb Hawkins	(802) 325-3309	Yes
Rutland County Solid Waste District HHW Depot	14 Gleason Rd, Mark Shea, Rutland, VT 05701-9001	Rutland	Mark Shea	(802) 773-9231	Yes
Fair Haven Transfer Stn	175 Fair Haven Ave, SWAC, Fair Haven, VT 057	Rutland	General Manager	(802) 265-8291	Yes
Rutland Town Transfer Stn	218 Northwood Park Rd, Rutland, VT 05736	Rutland	General Manager	(802) 747-9013	Yes
The Home Depot	299 US Route 4 E, Rutland, VT 05701-9034	Rutland	Store Manager	(802) 786-6900	Yes
Chittenden Transfer Station	300 Holden Rd, Chittenden, VT 05737-9800	Rutland	Elmer Wheeler	(802) 342-5701	Yes
Staples	300 S Main St, Rutland, VT 05701-4907	Rutland	Store Manager	(802) 773-0116	Yes
Solid Waste Alliance Communities	36 Blacksmith Ln, Sudbury, VT 05733-9564	Rutland	Deb Hawkins	(802) 342-5701	Yes
Gilmore Home Center	427 Route 4 A, Bomoseen, VT 05732-4437	Rutland	Tracey Gasoz-Rondini	(802) 468-5676	Yes
Benson Transfer Station	503 Glenn Rd, Benson, VT 05743-9477	Rutland	General Manager	(802) 342-5701	Yes
Solid Waste Alliance Communities	515 N End Rd, Tinmouth, VT 05773	Rutland	Gail Fallar	(802) 342-5701	Yes
Tinmouth Town Transfer Station	537 Route 140, Tinmouth, VT 05773	Rutland	Pamela Clapp	(802) 342-5701	Yes
Interstate All Battery Center	71 River St, Rutland, VT 05701-3935	Rutland	Store Manager	(802) 786-9075	Yes
Middletown Springs Transfer Station	8 Fire House Ln, Middletown Springs, VT 05757	Rutland	General Manager	(802) 342-5701	Yes
Bisbee's Hardware	109 Mad River Green, Waitsfield, VT 05673-7297	Washington	John Wilson	(802) 496-3635	Yes
NEKWMD Cabot Recycling Ctr	153 Sawmill Rd, Lower Cabot, VT	Washington	General Manager	(802) 626-3532	Yes
Town of Woodbury	1672 Route 14, Woodbury, VT 05681	Washington	Diana Peduzzi	(802) 625-2023	Yes
Staples	168 Ames Dr, Barre, VT 05641-2373	Washington	Manager General	(802) 476-2788	Yes
Nelson Ace Hardware	188 N Main St Ste 4, Barre, VT 05641-4370	Washington	Donna Davis	(802) 476-5700	Yes
ReSOURCE Household Goods	30 Granite St, Barre, VT 05641-4142	Washington	Dan Frost	(802) 477-7800	Yes
Casella Waste Management Depot	408 E Montpelier Rd, Suite 5, Montpelier, VT 05602-8255	Washington	Site Manager	(802) 224-0124	Yes
SunCommon	442 US Route 2, Waterbury, VT 05676-9247	Washington	Molly Higgins	(802) 882-8181	Yes
Reynolds and Son Inc.	47 Bridge St, South Barre, VT 05670	Washington	Brad Morse	(802) 479-0101	Yes
CVSWMD - ARCC	540 N Main St, Barre, VT 05641-2504	Washington	Lisa Liotta	(802) 476-1900	Yes
Hunger Mountain Co-op	623 Stone Cutters Way, Montpelier, VT 05602-3635	Washington	Sonia Keene	(802) 223-8000	Yes
Casella Waste Earthwise Transfer	6911 Main St, Waitsfield, VT 05673-6023	Washington	Jeannie Judkins	(802) 496-6394	Yes
Waterbury True Value Hardware	838 Waterbury Stowe Rd, Waterbury, VT 05676-9730	Washington	Jennifer Forkey	(802) 244-8905	Yes
Kenyons Hardware and Farm Supply	93 N Main St, Northfield, VT 05663-6742	Washington	Kristy Kenyon	(802) 485-9676	Yes
Worcester Transfer Station	Calais Rd, Worcester, VT 05682	Washington	General Manager	(802) 253-9503	Yes
Londonderry Solid Waste Group	100 Old School St, South Londonderry, VT 05155-9285	Windham	Esther Fishman	(802) 824-3356	Yes
Brown and Roberts Ace Hardware	182 Main St, Brattleboro, VT 05301-2892	Windham	Ed Morse	(802) 257-4566	Yes
J & H Do It Best	20 The Sq, Bellows Falls, VT 05101-1335	Windham	Heather Haskins	(802) 463-4140	Yes
Windham SWMD	327 Old Ferry Rd, Brattleboro, VT 05301-9175	Windham	Skip Bonnett	(802) 257-0272	Yes
Whitingham Transfer Station	4189 VT Route 100, Whitingham, VT 05361	Windham	Jen Herzig	(802) 368-7876	Yes
Londonderry Hardware	5700 VT Route 100, Londonderry, VT 05148-9537	Windham	General Manager	(802) 824-3926	Yes
Londonderry Transfer Station	7060 Route 100, Londonderry, VT 05148-9555	Windham	General Manager	(802) 824-5506	Yes
Rockingham Recycling Ctr	7446 US Route 5, Westminster, VT 05158-9680	Windham	Gary Derosia	(802) 463-9219	Yes
Staples	768 Putney Rd, Brattleboro, VT 05301-9005	Windham	Store Manager	(802) 257-5596	Yes
Town of Wardsboro	77 Dump Rd, Wardsboro, VT 05355-6707	Windham	General Manager	(802) 896-6542	Yes
Hartland Town Offices	1 Quechee Road, Hartland, VT 05048	Windsor	General Manager	(802) 295-5740	Yes
Town of Springfield	100 Recycle Road, Springfield, VT 05156-2140	Windsor	Dan Farrar	(802) 885-5827	Yes
Weston Town Office	12 Lawrence Hill Rd., Weston, VT 05161-0098	Windsor	General Manager	(802) 824-6645	Yes
Bethel Royalton Transfer Station	122 Waterman Rd, South Royalton, VT 05068-5286	Windsor	Jenn Bartleman	(802) 763-2232	Yes
Norwich Transfer Station	24 New Boston Road, Norwich, VT 05055	Windsor	General Manager	(802) 649-1192	Yes
Hartford Recycling Center	2590 N Hartland Rd, White River Junction, VT 05001-9819	Windsor	Wanda Stockman	(802) 295-5740	Yes

Windsor Municipal Building	29 Union St, Windsor, VT 05089-1503	Windsor	General Manager	(802) 674-6786	Yes
Ludlow Transfer Station	336 Route 100 S, Ludlow, VT 05149-9510	Windsor	General Manager	(802) 228-2846	Yes
Town of Cavendish	354 Route 131, Cavendish, VT 05142	Windsor	Mary O'Brien	(802) 226-7743	Yes
Bibens Home Center Inc.	362 River Rd, North Springfield, VT 05150	Windsor	Peter Torney	(802) 886-2288	Yes
Ludlow Transfer Station-Town Offices	37 Depot St, Ludlow, VT 05149-1300	Windsor	General Manager	(802) 228-2846	Yes
Cavendish Transfer Station-Town Offices	37 High St, Cavendish, VT 05142-4430	Windsor	Bruce Mcenaney	(802) 226-7291	Yes
Woodstock Ace Hardware	452 Woodstock Rd, Woodstock, VT 05091-9759	Windsor	Lee Lyman	(802) 457-3291	Yes
Weathersfield Recycling Center	5024 Route 106, Perkinsville, VT 05151	Windsor	General Manager	(802) 263-5651	Yes
A.B.L.E. Waste	512 E. Woodstock Rd, Woodstock, VT 05091	Windsor	General Manager	(802) 672-3569	Yes
Pomfret Town Offices	5218 Pomfret Road, North Pomfret, VT 05053	Windsor	General Manager	(802) 457-3861	Yes
Bridgewater Town Garage	65 School House Road, Bridgewater, VT 05034	Windsor	General Manager	(802) 672-5379	Yes
Sharon Town Offices	69 VT-132, Sharon, VT 05065	Windsor	General Manager	(802) 763-8268	Yes

Figure 3: Complete listing of active publicly accessible collection sites.

Account Name	Address	County	Contact	Telephone	Consumer drop off?
Good Point Recycling	227 Pond Lane, Middlebury, VT 05753	Addison	Robin Ingenthron	(802) 382-8500	No
Southwestern Vermont Medical Center	100 Hospital Dr, Bennington, VT 05201-5013	Bennington	Christopher Dargie	(802) 442-6361	No
Bennington VNA and Hospice	1128 Monument Ave, Bennington, VT 05201-9215	Bennington	Alice Hadley	(802) 442-5502	No
Brown Computer Solutions	116 Benmont Avenue, Bennington, VT 05201	Bennington	Kristi Briggs	(802) 681-7565	No
Walmart - WM	210 Northside Dr Ste 1, Bennington, VT 05201-1751	Bennington	Claims Department	(802) 447-1614	No
Energizer Mfg.	401 Gage St, Bennington, VT 05201-2515	Bennington	Randy Winnie	(802) 442-1469	No
Town of Bennington Rescue Squad	120 McKinley St, Bennington, VT 05201-1823	Bennington	William Hathaway	(802) 442-5817	No
VT Department of Health	324 Main Street, Suite 2, Bennington, VT 05201	Bennington	Laura Brundage	(802) 447-6414	No
Danville School	148 Peacham Rd, Maxfield English, Danville, VT 05828	Caledonia	David Schilling	(802) 684-2292	No
Burke Mountain	2559 Mountain Road, East Burke, VT 05832	Caledonia	Daniel Morse	(802) 626-7400	No
VT Dept of Health	108 Cherry St, ADAP/Suite 207, Burlington, VT 05401-4295	Chittenden	Paul Hochanadel	(802) 865-7742	No
VT Department of Health	108 Cherry Street, Ste 301 Debra Kaigle , Burlington, VT 05401-4295	Chittenden	Jaime Griggs	(802) 651-1876	No
VT Department of Health	118 Prospect Street, White River Junction, VT 05001	Chittenden	Brian Sargeant	(802) 295-8820	No
Richmond Elementary	125 School St, Richmond, VT 05477-9033	Chittenden	Jed Carini	(802) 434-2461	No
Green Mountain Power	163 Acorn Ln, Colchester, VT 05446	Chittenden	Emily Eckert	(860) 874-9786	No
Harbor Freight Tools USA	1775 Shelburne Rd, Burlington, VT 05403	Chittenden	Store Manager	(802) 391-8585	No
PC Construction Company	193 Tilley Drive, Tracy Wright, South Burlington, VT 05403	Chittenden	Amanda Cherrier	(802) 651-1255	No
Casella Waste Management	220 Avenue B, Williston, VT 05495-7148	Chittenden	Kelton Bogasky	(802) 651-5426	No
Best Buy	26 Cypress St, Williston, VT 05495-8209	Chittenden	Store Manager	(802) 872-0992	No
Essex Equipment	26 Kellogg Rd, Essex Junction, VT 05452-2806	Chittenden	Chris Stabile	(802) 878-5316	No
VT Department of Health	27 Federal St, Suite 201, St Albans, VT 05748	Chittenden	Gillian Marchessault	(802) 527-5581	No
ASIC North, Inc.	291 Hurricane Lane, Suite 100, Williston, VT 05495	Chittenden	Philip Witham	(802) 872-3040	No
Pine Haven Eco Campground	3 Pine Haven Rd, Colchester, VT 05446	Chittenden	Dunlap Riehle	(802) 355-5566	No
Vermont Air National Guard	30 Falcon St, South Burlington, VT 05403-5864	Chittenden	Peter Dufault	(802) 660-5926	No
VT Department of Health	300 Asa Bloomer Building, Rutland, VT 05701	Chittenden	Alexandra Breyer	(802) 786-5114	No
Timberlane Physical Therapy	321 Main St Ste D, Winooski, VT 05404-1380	Chittenden	Corey Vancura	(802) 864-3785	No
ReSOURCE Household Goods	329 Harvest Lane, Suite 200, Williston, VT 05495	Chittenden	Jeff Schake	(802) 860-4891	No
C.P. Smith Elementary School	332 Ethan Allen Pkwy, Burlington, VT 05408	Chittenden	Suzanne Clark Weishaar	(802) 864-8479	No
VHB	40 Idx Dr #200, South Burlington, VT 05403	Chittenden	Dorie Jones	(802) 497-6137	No
Milton Elementary School	42 Herrick Ave, Milton, VT 05468-3097	Chittenden	Rob Whitcomb	(802) 893-5501	No
SecurShred	472 Meadowland Dr., PO Box 2123, South Burlington, VT 05403	Chittenden	Jason Weed	(802) 863-3003	No
Frederick Tuttle Middle School	500 Dorset St, South Burlington, VT 05403	Chittenden	Amelia Lutz	(802) 652-7100	No
ENPRO Services of Vermont Inc	54 Avenue D, Williston, VT 05495-9704	Chittenden	Jeffrey Baker	(802) 923-1941	No
University Of Vermont	667 Spear St, Burlington, VT 05405-1734	Chittenden	Brian Medor	(802) 656-5408	No
VT Army Guard	789 National Guard Rd, Colchester, VT 05446-3046	Chittenden	Lee Ann Banks	(802) 338-3327	No
Walmart - WM	863 Harvest Ln, Williston, VT 05495-7319	Chittenden	Store Manager	(802) 878-5233	No
BETA Technologies	Attention Scale Models, 1081 Avenue D, Suite 10, Williston, VT 05495	Chittenden	Mike Bandy	(518) 813-6577	No
Town of Canaan	318 Christian Hill Rd, Canaan, VT 05903	Essex	Gregory Noyes	(802) 266-3370	No

Northwestern Medical Center	133 Fairfield St, Environmental Services, Saint Albans, VT 05478-1726	Franklin	Don Muller	(802) 524-8464	No
VT Department of Health	27 Federal St, Suite 201, Saint Albans, VT 05478	Franklin	Gillian Marchessault	(802)527-5581	No
Ben & Jerry's	900 Industrial Park Rd, Billie Davis, St Albans, VT 05478	Franklin	Billie Davis	(802) 393-6309	No
Town of Alburgh	1 N Main St, Alburgh, VT 05440-4404	Grand Isle	Amy Mashtare	(802) 796-3468	No
Needham Electric Supply	106 Goodell Ave, Morrisville, VT 05661-8517	Lamoille	David Murphy	(802) 888-7400	No
Casella Waste Hyde Park Transfer Stn	1855 VT 100, Hyde Park, VT 05655-9764	Lamoille	Alan Pelletier	(802) 851-6603	No
Cambridge Elementary School	186 School St, Jeffersonville, VT 05464-8920	Lamoille	Michelle Piche	(802) 644-8821	No
Lamoille Regional SWMD	29 Sunset Dr Ste 5, Joyce Majors, Morrisville, VT 05661-8313	Lamoille	James Gonyaw	(802) 888-7317	No
HearthStone	317 Stafford Ave, Morrisville, VT 05661	Lamoille	Christine Murphy	(802) 851-4229	No
VEC	42 Wescom Rd, Johnson, VT 05656-9579	Lamoille	Jim Rose	(802) 635-4213	No
Walmart - SUP	115 Seymour Dr, Derby, VT 05829	Orleans	Store Manager	(802) 624-8012	No
Kinney Drugs Inc	16 Church Street, Barton, VT 05822-0548	Orleans	Store Manager	(802) 525-4098	No
North Country Hospital	189 Prouty Dr, Newport, VT 05855-9820	Orleans	Susan Davio	(802) 334-3210	No
Columbia Forest Products	324 Bluff Road, Newport, VT 05855	Orleans	Ron Merrill	(802) 334-6711	No
Craftsbury, VT	335 VT RT 14, Craftsbury, VT 05826	Orleans	Penelope Doherty	(802) 586-2486	No
Walmart - WM	1 Rutland Shopping Plz, Rutland, VT 05701-5200	Rutland	Store Manager	(802) 773-0200	No
Rutland City DPW	130 Spruce St, Rutland, VT 05701-4422	Rutland	Dave Sears	(802) 773-1855	No
Rutland Regional Medical Center	160 Allen St, Rutland, VT 05701-4595	Rutland	Daniel Heleba	(802) 775-7111	No
Solid Waste Alliance Communities	181 Business Route 4, Center Rutland, VT 05736-9732	Rutland	Pamela Clapp	(802) 342-5701	No
Green Mountain Power	2152 Post Road, Rutland, VT 05701	Rutland	Dan Perry	(802) 747-8836	No
Solid Waste Alliance Communities	260 Chittenden Rd, Elmer Wheeler, Chittenden, VT 05737-9800	Rutland	General Manager	(802) 342-5701	No
Solid Waste Alliance Communities	2760 Stage Rd, Fair Haven, VT 05743-6400	Rutland	General Manager	(802) 342-5701	No
Town of Fair Haven	3 North Park Place, Fair Haven, VT 05743	Rutland	Beverly Fedolfi	(802) 265-3010	No
Audiology Associates	69 Allen St Ste 2, Rutland, VT 05701-4575	Rutland	Stephanie Brooks	(802) 773-8469	No
VT Department of Health	300 Asa Bloomer Building, Rutland, VT 05701	Rutland	Alexandra Breyer	(802) 786-5114	No
VT Agency of Natural Resources	1 National Life Dr - Davis 1, Mia Roethlein, Montpelier, VT 05620-3704	Washington	Mia Roethlein	(802) 522-5926	No
Waste Mgmt and Prevention Div	1 National Life Dr, Davis 1, Montpelier, VT 05620	Washington	Emma Stuhl	(802) 622-4325	No
State of Vermont, Agency of Administration	10 Taylor Street, Buildings and General Services, Montpelier, VT 05620	Washington	David Latoundji	(802) 828-3308	No
Worcester Town Hall	12 Worcester Village Rd, Worcester, VT 05682	Washington	Judy Knapp	(802) 223-6942	No
Ben & Jerry's	1281 Waterbury-Stowe Road, Waterbury, VT 05676	Washington	Randy Thompson	(802) 882-2056	No
Central VT Medical Center	130 Fisher Rd Unit 1, Berlin, VT 05602-8132	Washington	Charlie Cerutti	(802) 371-4477	No
Central VT SWMD	137 Barre St, Lisa Liotta, Montpelier, VT 05602-3618	Washington	Lisa Liotta	(802) 229-9383	No
Fothergill Segale & Valley	143 Barre St, Montpelier, VT 05602-3618	Washington	Mariann Tilton	(802) 223-6261	No
Main Street Middle School	170 Main St, Montpelier, VT 05602-2497	Washington	Don Taylor	(802) 223-3404	No
Sugarbush Resort	1840 Sugarbush Access Rd, Warren, VT 05674-9747	Washington	Amy Kretz	(802) 583-6570	No
Walmart - WM	282 Berlin Mall Rd, Berlin, VT 05602-8292	Washington	Store Manager	(802) 229-7792	No
Washington Electric Cooperative	40 Church St, East Montpelier, VT 05651	Washington	Mike Gray	(802) 223-5245	No
Town of East Montpelier	40 Kelton Rd, East Montpelier, VT 05651	Washington	Rosie Laquerre	(802) 223-3313	No
Aubuchon Hardware	40 Main St, Montpelier, VT 05602	Washington	Henry Witte	(802) 223-1700	No
Vermont Department of Public Safety	409 US Route 2, Montpelier, VT 05602-8867	Washington	Angela Allen	(802) 229-0882	No
State of Vermont, BGS	91 State Dr, Waterbury, VT 05676-1595	Washington	Kevin Rogers	(802) 241-6547	No
NORTHEAST RECYCLING COUNCIL	139 Main St Ste 401, Brattleboro, VT 05301-3040	Windham	General Manager	(802) 254-3636	No
Brown Computer Solutions	27 Birge St, Brattleboro, VT 05301	Windham	Patrick Brown	(802) 289-3489	No
Town of Whitingham	2948 VT Route 100, Jacksonville, VT 05342	Windham	Gig Zboray	(802) 368-7500	No
WW Building Supply	7 Loop Road, Newfane, VT 05343-9737	Windham	John D'Angelis	(802) 365-4333	No
Simon Pearce	109 Park Road, Windsor, VT 05089	Windsor	Stephanie Murphy	(802) 230-2411	No
VA Medical Center (138)	215 N Main St, White River Junction, VT 05009-0001	Windsor	James Borelli	(802) 295-9363	No
Rochester Elementary School	222 S Main St, Rochester, VT 05767-9679	Windsor	Stacey Mazzola	(802) 767-4632	No
South Royalton School	223 S Windsor St, South Royalton, VT 05068-9625	Windsor	Ray Ballou	(802) 763-7740	No
Greater Upper Valley Solid Waste District	38 Ascutney Park Rd, Ascutney, VT 05030	Windsor	Ham Gillett	(802) 296-3688	No
Weathersfield Town Office	5259 US Route 5, Ascutney, VT 05030	Windsor	Ray Stapleton	(802) 263-5651	No
King Arthur Flour	58 Billings Farm Road, Wilder, VT 05001	Windsor	James Kirkpatrick	(802) 299-1674	No
UPS	95 Olcott Drive, White River Junction, VT 05001	Windsor	Amish Thaker	(802) 295-2436	No
VT Department of Health	118 Prospect Street, White River Junction, VT 05001	Windsor	Brian Sargeant	(802) 295-8820	No

Figure 4: Complete listing of active private collection sites.



New and existing collection locations that are accessible to Vermont residents are listed on Call2Recycle's website [locator](#). Residents can search by zip code or city and state to find the nearest battery collection location (*Figure 5*).

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 12 consecutive months are automatically removed from the locator.

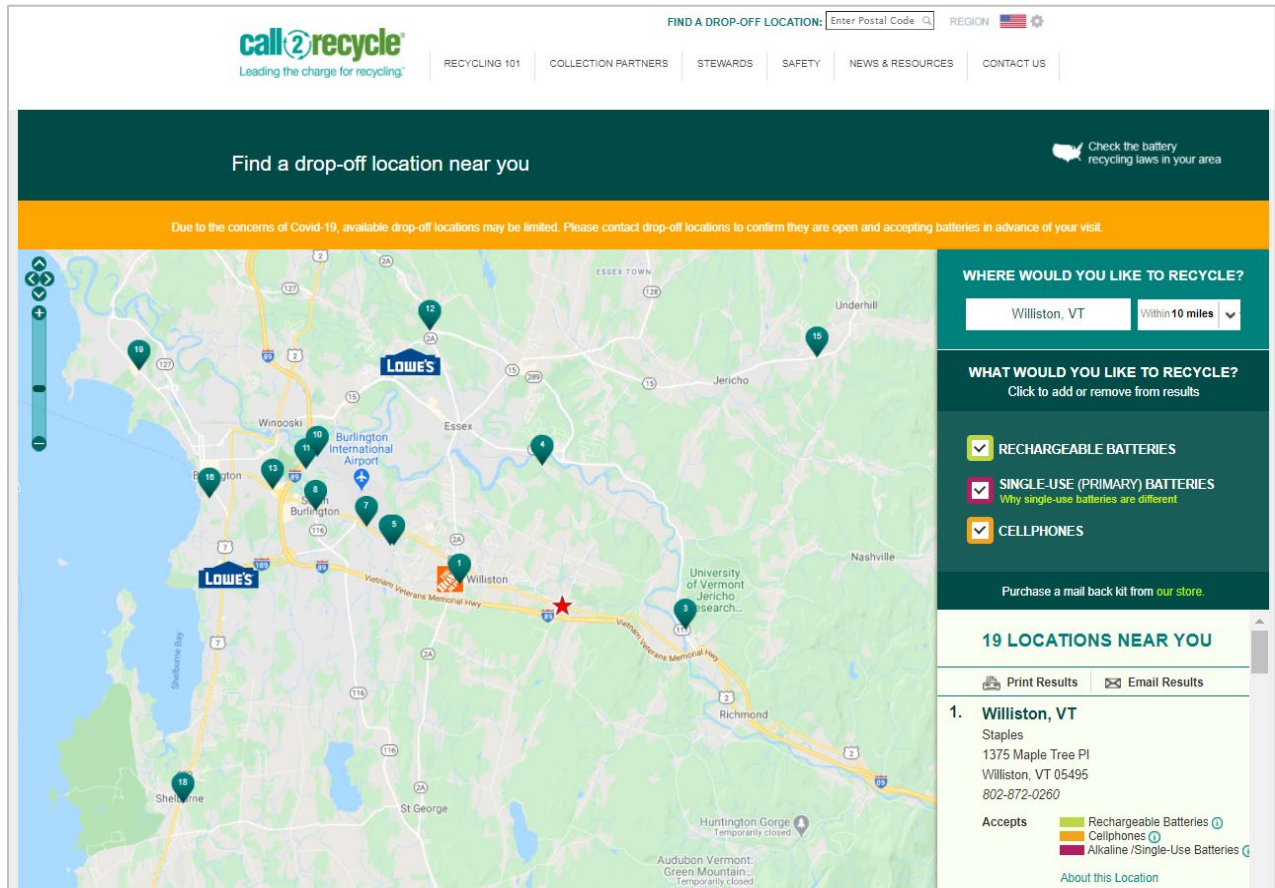


Figure 5: Drop off locator used to query Williston, VT with 19 active sites showing for public drop off.

## 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 properly handling and delivering designated batteries for recycling.

- **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

Call2Recycle currently uses UPS and FedEx Ground to transport boxes from a central fulfillment facility to its collection sites. Filled boxes are shipped from Vermont collection sites to sorters using the same carriers. Call2Recycle's contracted bulk transporters are FedEx Freight & UPS Freight. All 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 Sean Fitch 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.
	FedEx Ground Leann Steinberg 1675 Airport Rd. NW Kennesaw, GA 30144 (800) 463-3339 / <a href="http://www.fedex.com">www.fedex.com</a>	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.
	FedEx Freight Leann Steinberg 1675 Airport Rd. NW Kennesaw, GA 30144 (800) 463-3339 / <a href="http://www.fedex.com">www.fedex.com</a>	Founded in 2001 with FedEx's acquisition of American Freight ways and Viking Freight, FedEx Freight offers less than truck load (LTL) services across the United States. They are used to pick up and transport bulk loads from Vermont battery collectors to Call2Recycle sorters.
	UPS Freight Rob Eskew 8550 Cobb International Blvd. NW Kennesaw, GA 30152 (800) 333-7400 / <a href="http://www.upsfreight.com">www.upsfreight.com</a>	Founded in 2005 with UPS's acquisition of Overnight transportation, UPS Freight offers less than truck load (LTL) services across the United States. They are used to pick up and transport bulk loads from Vermont battery collectors to Call2Recycle sorters.

## D. Processing Facilities

Call2Recycle's downstream 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 adhere to the standards of industry recognized recycling certification(s) and submit to audits by Call2Recycle or other external audit parties. Some examples are noted below:

- Annual desktop due-diligence compliance audits.
- 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 C)*
- 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 D)*
- Occupational Health and Safety Advisory Services (OHSAS) 18001 (to be replaced by ISO 45001): 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.
- Basel Action Network (BAN): Call2Recycle is the first battery collection and recycling program to be recognized as an e-Steward Enterprise, by the Basel Action Network (BAN), for ensuring the responsible downstream management of all toxic materials, no use of child, coerced, or prison labor, and that toxic waste management must be done in accordance with best available practices to protect workers and the environment.

Primary batteries collected in Vermont will first travel to one of Call2Recycle’s approved sorting partners, where the batteries will be weighed, separated by battery chemistry, and consolidated with similar types, to then be transported to a network of approved battery processors. Call2Recycle has successfully vetted and received Board of Director’s approval for the following companies to serve its approved network of downstream processors *(Figure 6)* of primary and rechargeable batteries:

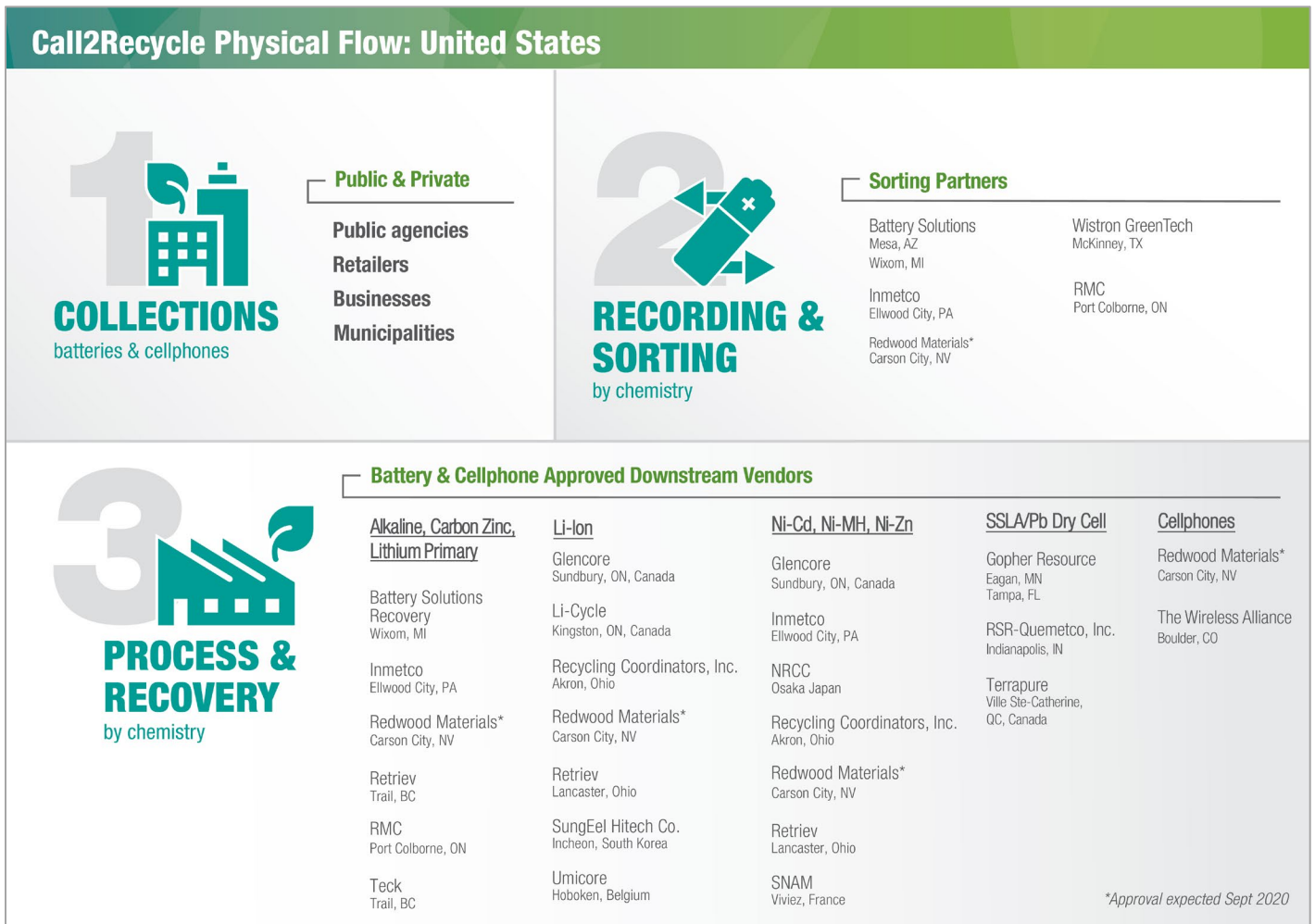



Figure 6: Approved network of downstream processors.

Battery Solutions Recovery, LLC will be the main processor, with Inmetco and Raw Materials Company as secondary processors, of used non-lithium primary batteries collected in Vermont. Lithium primary batteries collected in Vermont will be processed by Retriev Technologies. Below please find a description of each processor:

Recycling Facility	Contact Information
	Battery Solutions Recovery, LLC 7266 Kensington Rd., Brighton, MI 48116 800-852-8127 <a href="http://www.batteryrecycling.com">www.batteryrecycling.com</a>


Battery Solutions Recovery, LLC was selected as a processor for Call2Recycle 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 can 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: 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.

Recycling Facility	Contact Information
	INMETCO One INMETCO Drive, Ellwood City, PA 16117 724-758-5515 <a href="https://azr.com/about/inmetco/">https://azr.com/about/inmetco/</a>

The International Metals Reclamation Company (INMETCO), a subsidiary of American Zinc Recycling, utilizes a rotary hearth and an electric arc furnace for thermal metal reclamation. INMETCO processes alkaline, carbon zinc batteries, as well as nickel-based rechargeable batteries. INMETCO was selected as a processor for Call2Recycle based on the following qualifications:


- Recycling Efficiency Rate (RER):** INMETCO currently attains an 85% (using a “dry” process) RER, which significantly exceeds 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, INMETCO exceeds it.
- Efficiency & Cost:** INMETCO is the only primary battery processor which takes the zinc oxide produced through thermal treatment and refines it into a variety of zinc uses, including as an input into the manufacture of alkaline batteries. This “virtuous circle” to battery processing is unique. In addition, INMETCO has historically been the most cost-effective option in North America, balancing the cost of processing with its overall performance.



Recycling Facility	Contact Information
	Redwood Materials, Inc. 2801 Lockheed Way Carson City, NV 89706 (408) 477-9811 <a href="http://www.redwoodmaterials.com">www.redwoodmaterials.com</a>

Redwood Materials, Inc. (Redwood) operates a facility that reprocesses batteries into final product and commodities. Redwood processes lithium primary as well as lithium ion and nickel metal hydride rechargeable batteries. Redwood is an approved processor for Call2Recycle based on the following qualifications:

- Recycling Efficiency Rate (RER):** Redwood’s recycling efficiency rates consistently exceed the prevailing global standard of 50%, as decreed by the European Union (EU).
- Efficiency and Sustainability:** Redwood Materials, Inc. (Redwood) operates a facility to process batteries and electronics scrap into commodities. Redwood receives, refines and treats material using a hybrid process combining heat treating and hydrometallurgical processing. Using proprietary technology, they are able to recover metals from electronics and batteries including nickel, copper, cobalt, lithium, as well as lead, tin, iron, aluminum, silver and gold. The lithium main product outputs of the battery process are high-purity nickel and cobalt shot, lithium concentrate and alloy ingots. Redwood is the only battery recycler operating at commercial scale in the United States to employ hydrometallurgical processing for lithium-based batteries. They are also the only recycling operation in the United States accepting lithium primary batteries.

Recycling Facility	Contact Information
	Raw Materials Company Inc. 17 Invertose Drive Port Colborne, ON L3K 5V5 Canada <u>(905) 835-1203</u> <a href="http://www.rawmaterials.com">www.rawmaterials.com</a>

Raw Materials Company, Inc (RMC) in Port Colborne, Ontario, Canada is an international leader in the field of waste and resource recycling. Founded in 1985, they operate a 3.5-acre facility and have been ISO 14001 certified since 2000. They are authorized by the Ontario Ministry of Environment to accept for recycling intact waste batteries, common mercury waste as well as waste electrical and electronic equipment (Environmental Compliance Approval A123016). Specifically, and for Call2Recycle, they are a processor of alkaline batteries.

- Recycling Efficiency Rate (RER):** RMC has a recycling efficiency rate of 84% RER. This has been independently audited under the CSA Group Guidelines SPE-890-15. The guideline establishes a set of common definitions, performance metrics and reporting requirements to facilitate best practices for the accountable management of end-of-life (EOL) waste materials, including consumer batteries.
- Technology:** RMC’s patented RMC 3500 (3rd generation) recycling technology for alkaline batteries achieves a recycling efficiency score of 84% and an overall diversion score of 87%. That means that 84% of the resources inside each alkaline battery processed using RMC’s technology are reused in applications that the materials were originally mined for. The process operates under negative pressure reclaiming the chlorine, ammonia, and mercury vapors. Their process to recycle alkaline batteries creates negligible greenhouse gas emissions.
- Senior Leadership:** RMC is led by President, James Ewles, who joined RMC in 1998. He holds three internationally registered patents and has been recognized as the OWMA Canadian Executive of the year (2019), One of Canada’s Clean 50 (2015), Niagara Entrepreneur of the Year (2014) and is a PCWCC Presidential Award recipient (2014).

Alkaline batteries processed by RMC are reduced in size prior to shredding. Ferrous metals are removed prior to further mechanical separation. The materials recovered in the RMC process are zinc, manganese, potassium, and steel. 100% of the zinc, manganese and potassium is recovered and used as a premium micro-nutrient to grow corn - an originally intended application. The use of RMC micro-nutrients increases corn yields by 20 bushels per acre. Approximately 25% of an alkaline battery is made up of steel and nickel. Through their mechanical process, 100% of the steel and nickel is recovered and sold back into the local market as a premium product in the production of new metals.



Recycling Facility	Contact Information
	Retriev Technologies 9384 Highway 22A Trail, BC V1R 4W6 <a href="http://www.retrievtech.com/">www.retrievtech.com/</a>

Retriev Technologies Ltd, located in Trail, British Columbia, 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 summaries for Retriev Technologies and for Battery Solutions Recovery, LLC can be found in *Appendix E* and *Appendix F*, respectively. Call2Recycle, Inc. may employ other sorting facilities in the future as appropriate at its sole discretion.

Full audit summaries for approved sorters and/or processors handling the Vermont Program’s primary batteries, including Battery Solutions, Retriev Technologies, Inmetco, Redwood Materials Company, and Raw Materials Company, are available upon request.

### Call2Recycle R2 Certification

Call2Recycle receives Responsible Recycling (R2) certification (*Appendix C*) 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.

### 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.

### Downstream Vendor Selection Documents

For Call2Recycle’s downstream vendor selection control documents, see Appendix G, providing *Downstream Vendor Selection Program (Work.01.08.01)*, *Downstream Vendor Questionnaire (Form.01.08.01)*, and *R2 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 (USDOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) to ensure safe collection, transportation and recycling of both rechargeable and primary batteries collected by the program.

The safety of consumers, collection sites, transporters, sorters, and processors, remains a top priority for Call2Recycle. To advance its commitment to safety, Call2Recycle introduced a flame-retardant liner in all of its battery collection boxes. This patented innovation offers an additional layer of protection in the prevention of a thermal event during the battery journey – from collection to transportation to sorting and processing. When used in conjunction with Call2Recycle’s program and regulatory terminal protection guidelines, the liner helps prevent flames from escaping the battery box in the event of a thermal runaway.

- No additional set-up: the liner comes affixed to the inside of the collection box
- Third-party tested: underwent extensive testing by an independent laboratory
- Heat limit: withstood up to 1,100 degrees Fahrenheit
- Containment: prevents flames & heat from spreading outside the shipping container
- Reusable: liners are removed at sorter and processor locations and reused in the distribution of new boxes.
- Recyclable: polyester material manufactured from used plastic bottles

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. 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, state, 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 USDOT and PHMSA to ensure safe collection, transportation and recycling of batteries, it also works closely with collection sites to ensure they have the necessary training and education to safely collect and ship batteries for recycling.

Educating and training collection sites on safe and compliant handling and shipping of batteries begins when new sites are enrolled. Prior to shipping collection boxes, all new sites are required to successfully complete an on-line safety training course. Once successfully completed, the site is activated and Call2Recycle will then begin shipping the site boxes so they can start collecting batteries. Ongoing awareness and education continue beyond initial enrollment as regulations and best practices constantly evolve.

Call2Recycle will continue to bring program updates and training directly to Vermont collection sites, including via the *Vermont Hazardous Waste Network* meetings for Household Waste Managers, scheduled by VT ANR-DEC and *Vermont E-Cycles Program/Mercury Education and Reduction*, where Call2Recycle delivers statewide training to retail and solid waste district staff.

Call2Recycle's VT safety training addresses practices for the safe handling, storing, and shipping of all consumer battery types. However, due to its higher susceptibility to thermal runaway and stringent transportation requirements, Call2Recycle does focus heavily on lithium batteries, including both lithium primary (covered under this plan) and lithium-ion rechargeable (out of scope of VT's primary stewardship plan).

Appendix H, provides the training slides used in VT, which covers the following topics:

- Identifying battery type and chemistry.
- Terminal protection for shipping to prevent thermal incidents.
- Department of Transportation guidelines for shipping batteries.
- Identifying and managing DDR (damaged-defective-recalled) lithium batteries.
- Use of Call2Recycle's battery collection boxes with flame retardant liners.
- Sealing, shipping, and labeling for boxes.

VT training includes guidelines for using Call2Recycle's [collection boxes](#). These boxes are pre-labeled for [US DOT Special Permit 14849](#) (See Appendix I). The box exempts a shipper from CFR 49 certification requirements, and allows shipping of mixed-batteries, including lithium-metal and lithium-ion batteries, up to 300 watt-hours.

Call2Recycle also offers fee-based [DDR \(damaged-defective-recalled lithium batteries\) kits](#) to VT collection sites. As of this Plan, Call2Recycle is not aware of any kits ordered in VT (or nationally) that were requested for lithium primary batteries, specifically. These kits are typically used for rechargeable lithium-ion batteries instead. The kits are pre-labelled with US DOT Special Permit 20549 (see Appendix J).

Call2Recycle offers safety resources on the Vermont specific page of its website, [www.call2recycle.org/vermont](http://www.call2recycle.org/vermont). Resources include battery recycling awareness posters, bulk shipping safety guidelines, box terminal protection guidelines, and answers to frequently asked questions.

Additional training details:

- Call2Recycle uses an aggressive onboarding process to ensure that newly enrolled locations are trained and actively participate in the battery collection program.
- Call2Recycle also has a dedicated collection site outreach program that includes contacting sites, minimally twice a year, to review program specifics, shipping, and compliance and to secure feedback on the program. This outreach may be done via phone, email, in-person, or a combination.
- Non-compliant shipments (unprotected terminals, overweight, etc.) are recorded for each individual collection site at the time the receipt is processed. Upon recording, the collection site is contacted by email and/or phone to advise them of the incident. 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 online with the use of a program that assists in utilizing the correct language that is monitored by the DOT. 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."
- Regular safety updates are provided to program participants to maintain USDOT compliance. Updates are communicated regularly through multiple outreach, including calls, emails, newsletters, collateral 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.
- Call2Recycle's [Safety Portal](#) offers a variety of resources 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.

## 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.*

### B. Strategic Approach

The Education and Outreach section includes:

- Target Audience & Key Messages
- Objectives, Strategies and Metrics
- Additional Enhancements & Continuous Improvements

#### Education & Outreach Practices

The past five years of battery stewardship has provided new insights into Vermont outreach efforts, along with collaboration with Vermont Agency of Natural Resource (VT ANR), collection networks, residents, and stakeholders. Integrating these insights into the 'New Normal' brought on by COVID-19, Call2Recycle will continue to deploy its comprehensive approach to increase overall awareness and incidences of consumer battery recycling, while working collaboratively with collection sites and local stakeholders. These practices include:

- Call2Recycle website (dedicated Vermont page, drop-off locator)
- Customer Service Support (calls, visits, inquiry management)
- Collateral (i.e. posters/rack cards, fact sheets)
- Social media (combination of paid and organic)
- Digital media (videos, web banners, newsletter content, email marketing)
- Sponsorships and Partnerships
- Traditional media (Print/Online/Radio/Television)
- Earned media (articles/interviews)
- Events/Conferences/Site Visits

## Target Audiences



## Message Pillars

Call2Recycle's Education and Outreach Plan is based on a comprehensive set of three interconnected objectives to further penetrate the Vermont market. The 'three pillars' - *Reinforce*, *Bolster*, *Inspire* – will serve as the foundation of Call2Recycle's Education and Outreach Plan.

1. **Reinforce** battery recycling awareness
  - a. Inform that a program exists; batteries can and should be recycled
  - b. Educate how and where to do it
2. **Bolster** battery collections
  - a. Introduce new and unique ways to make battery recycling more convenient and safer for collection sites and consumers
  - b. Strengthen existing collection network and strategically expand into new categories
3. **Inspire** Vermonters to collect and recycle batteries
  - a. Promote local benefits and ease of battery recycling
  - b. Engage 'wishful recyclers' to ensure batteries are responsibly managed at end-of-life.

## C. Objectives, Strategies & Metrics

### ➤ **Objective 1:** *Reinforce* battery recycling

Call2Recycle will deploy new, creative, and innovative ways to tell the Vermont battery recycling story. This is a critical component to ensure that Vermonters know that battery recycling options are available despite the COVID-19 implications.

#### **Strategies:**

- Deepen relationship with Vermonters, communications and messaging will center around Vermont's unique attributes and incorporate images and messaging relevant to Vermont.
- Integrate 'short bursts' of campaign-based marketing (National Battery Day, Earth Day, Daylight Saving Time, etc.) with an 'Always On' strategy to drive awareness at a consistent rate throughout the year using social media and digital advertising.
- Maximize budget to maximize impact by partnering with collection sites and other strategic entities to extend consumer reach. Call2Recycle will continue its work with other stewardship programs operating in Vermont to increase awareness and encourage recycling.
- Create influencer campaigns to reach social communities to promote awareness and engagement.
- Continue to promote and enhance the web-based statewide battery collection site locator.
- Refresh the look, feel and usability of the dedicated Vermont landing pages to provide valuable resources to consumers, collection sites, and other stakeholders.
- Execute an ongoing content series on battery recycling that can be enjoyed virtually.
- Engage Vermont educators to encourage students to adopt early recycling behaviors by promoting the availability of Call2Recycle's education curriculum that is being developed in partnership with National Geographic.
- Commission third party research to gain deeper insights into consumer recycling behavior, especially during COVID-19, to identify opportunities to more efficiently and effectively secure battery collections.
- Leverage community-building platforms, like Nextdoor or Front Porch Forum, to engage Vermonters directly at the community level.

#### **Success Metrics:**

- Advertising and media impressions.
- Unique website visitors
- Web-based drop-off locator searches
- Social media engagement/followers
- Battery Collections (in lbs) via public-facing channels
- Omnibus (% awareness and incidence)
- Number of curriculum downloads by VT educators

### ➤ **Objective 2:** *Bolster* battery collections

The spread of COVID-19 has accelerated consumers' expectations around safety and convenience, now and for the foreseeable future. While deeply rooted in shifting shopping behaviors, it also indirectly influences battery collection and recycling. Call2Recycle will respond to these changes in demands by enhancing its program to support convenience, social distancing, and contactless options for both the collection sites and consumers.

#### **Strategies:**

- To satisfy the need for greater convenience, Call2Recycle will pilot an 'at home' battery mail-back option where Vermonters can obtain a kit or envelope to fill with batteries and return for recycling. Potential options for consumers to receive a mail-back envelope could include: online ordering on Call2Recycle's website promoted via direct mail to consumer residences or displays at VT solid waste districts, or retail outlets. A mail-back option allows Call2Recycle to augment its physical collection network with a solution to underserved, rural markets.
- Expand battery safety education and training outreach, materials, and offerings, including staff training, videos, how-to guides, and specialized packaging for handling and transporting. In-person visits, when possible, coupled with webinars, phone, and email outreach, will emphasize best practices for safely packaging and shipping batteries.



- Diversify collection network by expanding the availability of its program to align with consumers shift in spending patterns – eCommerce, grocery/general merchandise, local pickup, and delivery.
- Invest in developing tools and resources that drive collection site retention and demonstrate value of participation, including signage, collateral, awards program, etc.
- Engage stakeholders, like the Household Hazardous Waste Group, to identify significant battery collection and recycling challenges. Insights gleaned will be used to pivot messaging, expand offerings, and enhance the program, as necessary.
- Call2Recycle will design point of purchase and retail display materials to be offered to Vermont retailers to place alongside battery sale displays, indicating that batteries can be recycled free of cost in Vermont. Materials may include a scannable QR Code that will link the consumer to Call2Recycle’s available recycling options.

**Success Metrics:**

- User adoption of mail back solution (# of households, battery volume returned)
- Number of stakeholders and collection sites reached through engagement series
- Downloads and use of Vermont program resources
- Maintain over 95% accessibility rate for Vermont residents (percentage of residents with access to a battery collection location within 10 miles of their home)

➡ **Objective 3: Inspire** Vermonters to collect and recycle batteries

Although ~61% of Vermonters are aware that primary batteries can be recycled, they must be inspired to act to do it and to do it responsibly. Using several strategies, Call2Recycle will cultivate a greater understanding of the battery recycling benefits and positive safety and environmental impacts on Vermont.

**Strategies:**

- A 2019 survey commissioned by Call2Recycle and administered by Ipsos indicates that younger generations are still lagging older generations in recycling primary batteries. Call2Recycle will expand its messaging and outreach channels to reach this youth audience to help shape recycling behaviors, and ultimately increase collections for long-term program success.
- Engage ‘wishful recyclers’ (Vermonters who toss items into the recycling bin that they think are or should be recyclable, yet can have significant safety, environmental or operational impacts) to ensure batteries are responsibly and properly managed at end-of-life. A 2018 survey commissioned by Call2Recycle and administered by Ipsos, indicates that younger generations are more likely to engage in wishful recycling. Call2Recycle will adapt its messaging and graphics to clearly depict that no battery should be recycled in the “blue bin”, and that batteries must be recycled only at designated battery drop-off locations.
- Produce collateral and compelling content that promotes local benefits and ease of battery recycling. This will include the development and distribution of Vermont-centric public service announcement(s) (PSA) statewide to highlight the availability and importance of battery recycling, as well as emphasizing safety and environmental motivations. The PSAs will also be available to VT ANR, solid waste districts and other stakeholder groups to help spread the message.
- Make Vermont’s battery recycling progress visible and regularly report via website and/or social media.
- Utilize formal and informal research to further segment those with the highest propensity to recycle batteries.
- Targeted engagement campaign will offer large Vermont businesses and corporations the opportunity to demonstrate their sustainable business practices by offering their employees more information and access to convenient battery collection & recycling. As a member of Vermont Businesses for Social Responsibility, Call2Recycle will leverage this stakeholder group to identify best channels to disseminate the program offering.

**Success Metrics:**

- Omnibus (increase in consumer recycling incidence)
- Advertising and media impressions
- Unique website visitors
- Web-based drop-off locator searches
- Social media engagement/followers
- Battery Collections (in lbs) via public-facing channels
- Number of new businesses enrolled & pounds recovered

## D. Additional Enhancements & Continuous Improvements

- **Research:** Since 2015, through a credible, third-party, Call2Recycle has been deploying consumer surveys in Vermont to measure awareness (% of Vermonters that know single-use batteries can be recycled) and incidence (% of Vermonters that have recycled single-use batteries in past 12 months), as well as the demographics of who is and is not recycling, where are they recycling and motivations for recycling. While awareness and incidence have grown from 48% in 2015 to 61% in 2019 and 32% in 2015 to 49% in 2019, respectively, Call2Recycle will continue its annual Omnibus survey to continue measuring effectiveness of its education and outreach activities. However, Call2Recycle believes it necessary to establish a new benchmark given the impacts of COVID-19. Therefore, through dedicated social media polls and a third-party performed research study, Call2Recycle will extrapolate behaviors and demographics of involved and disinterested recyclers and tailor its education and outreach to target those audiences.
- **Marketing Communications Firm:** Call2Recycle is undergoing a review of its current marketing partner through a statewide RFP process and expects to have confirmed the partner in January 2021. The selected partner will play an integral role in contributing to specific initiatives and further defining the tactical details.
- **Budget:** Call2Recycle commits to spending 20% of its producer fees on Education & Outreach in 2021.
- **Delivery of Annual Plans:** To allow for adjustments to changing market conditions, Education and Outreach plan objectives and/or tactics may change throughout the year. Therefore, Call2Recycle will deliver its Education and Outreach plan annually to VT ANR, which will detail specific strategies, tactics, metrics, etc., which can (and should) shift year-to-year.
- **Annual Virtual Meetings:** Call2Recycle will meet annually in December with VT ANR-DEC Solid Waste Program staff to share planned outreach strategies for the upcoming year. The meeting will also outline collection goal projections for the upcoming year. Included will be a financial breakdown of the 20% Education & Outreach budget from producer fees.

## VII. Producer to Producer Reimbursement

### A. Statutory Citation

#### *10V.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 (batteries from brands that are no longer in business) or batteries from “free-riders” (batteries from brands that are not participating in Call2Recycle’s or another 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.

Additionally, Call2Recycle will routinely monitor battery sales in the State at various retail locations 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

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.

Results of these audits show the number of non-participating brands increasing over time. In the largest sampling yet, from 2019, with over 70,000 batteries cataloged, approximately 234 battery brands were from participating stewards, with 1,028 from non-participating stewards, who may be exempt from the law. Many of these brands originate from overseas producers, and may be exempt from the legislation, as embedded batteries in products and packaging. Volume numbers appear to be statistically below the \$2000 annual sales exemption in the legislation, so the brands are not enforceable. Nonetheless, Call2Recycle continues to engage with potential stewards, to include the maximum number under the program. Likewise, Call2Recycle will continue to encourage the state of Vermont to eliminate “carve-outs” in the legislation that create exemption battery categories, like business to business batteries.

## 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

For 2021, Call2Recycle is establishing a collection rate of 17% based on historical data, program modifications and assumptions.

The Vermont Primary Battery Stewardship Law was the first U.S. extended producer responsibility regulation for primary batteries. As such, there was no historical, U.S. data available for Call2Recycle to develop the original plan’s collection rate target or to compare its ongoing performance. As an alternative, Call2Recycle used a series of datasets from jurisdictions outside the U.S. (i.e., Canadian regulated provinces, European Union) to estimate a collection rate target of 20% by the end of year five. Projecting collection rate targets five years into the future proved to be challenging. While collection performance exceeded targets in years one and two, performance fell short by one percentage point in years three and four. Year five performance is also projected to fall short of the target in the approved plan. Yet, through the first four complete years of the plan, Call2Recycle’s total primary batteries collected (in pounds) has increased each year.

Most of the year five collection shortfall has been due to the COVID-19 global pandemic, which has significantly hurt battery collection and recycling worldwide, including in Vermont. In Vermont, Call2Recycle anticipates finishing 2020 with a 10-12% collection rate, which is 8-10% points below its year five collection rate target. “Shelter in place” orders, which kept approximately 50% of the U.S. workforce home, preventing consumers from traveling to collection sites is the most notable impact on battery collection during the pandemic. Additionally, many collection sites (i.e., retailers and solid waste entities) reduced hours or closed altogether during this crisis. Many have still not resumed normal operations.

With lingering uncertainty on the continued impact of the pandemic and its effect on consumer behavior, accurately estimating a five-year collection rate path is frustratingly speculative. Instead, Call2Recycle is proposing a collection rate target of 17% for 2021 only. Achieving the proposed 2021 target assumes the following:

- Health and Safety
  - Vermont COVID-19 cases maintain or reduce their current levels.
  - Vermont maintains or eliminates current safety protocols, avoiding new lockdowns or quarantines, ensuring public battery collection sites remain open and operational.
  - Vermont Solid Waste Entities’ new COVID-19 protocols allow for safe and efficient battery collections, convenient for both staff and customers.

- Vermont Solid Waste Entities restart their public collection events.
- Vermont businesses re-open, allowing Vermonters to recycle their batteries at their place of employment.
- Economic Conditions
  - Consumer spending rebounds, accelerating battery and electronic device purchases.
  - Vermont's retail economic condition improves, and customer retail visits return to pre-COVID-19 numbers, especially large retail battery collection partners.
- Behavior Adoption
  - Vermont citizens respond to new outreach campaigns and channels, designed to educate them on new recycling opportunities.
  - Vermont citizens adapt their behaviors to embrace new forms of battery recycling.
  - Vermont businesses develop methods to collect their remote employee batteries that would have previously been collected at work.
  - Demographics most affected by COVID-19, especially the older high-risk generation, respond to new convenience options, like online recycling opportunities.

Call2Recycle commits to year-over-year collection increases, starting with 17% in 2021, and increasing each year thereafter for a five-year Plan, or for the term approved by VT ANR-DEC. The intent for a five-year plan would be to exceed a 20% collection rate by term end.

Call2Recycle will submit the upcoming year's collection rate target to VT ANR-DEC at the annual (virtual or in-person) December meeting, to be provided as an addendum to this Plan.

At the December meeting, Call2Recycle will also provide the upcoming year's education & outreach activities to meet the proposed collection targets.

## 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

As historically done, beginning on March 1, 2022, and annually thereafter, Call2Recycle will provide an annual report to the Secretary of the Agency of Natural Resources, which will also be posted with previous year's [here](#). The report will include, but not be limited to, the following:

1. The total weight (in pounds) of primary batteries collected in the State.
2. An estimate of the total weight of primary batteries (in pounds) 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 Call2Recycle's 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 estimated 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, an independent third party will conduct the one-time program assessment of the primary battery stewardship program, as required by Legislation. In addition to providing the assessment to the state, the results and insights gleaned from the initial plan audit will be used to enhance the program, as appropriate.

Please see Appendix K, for the assessment scope of work, based upon VT ANR-DEC and Call2Recycle's coordinated criteria to meet the legislative requirements and generate valuable program insights.



## Vermont Primary Battery Stewardship Plan: Appendices

<b>Appendix</b>	<b>Description</b>
Appendix A	U.S. Department of Transportation Special Permit 16563
Appendix B	Terminal Protection Reference Guide
Appendix C	Responsible Recycling (R2) 2013 Certificate
Appendix D	International Standardization Organization (ISO) 14001 Certificate
Appendix E	Retriev Technologies Environmental Audit
Appendix F	Battery Solutions Recovery, LLC Environmental Audit
Appendix G	Downstream Vendor Selection Documents
Appendix H	Vermont Training Slides
Appendix I	U.S. Department of Transportation Special Permit 14849
Appendix J	U.S. Department of Transportation Special Permit 20549
Appendix K	Audit Scope of Work

November 07, 2019



U.S. Department  
of Transportation

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

**Pipeline and Hazardous  
Materials Safety Administration**

DOT-SP 16563  
(SECOND REVISION)

**EXPIRATION DATE: 2021-08-31**

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: Call2Recycle, Inc.  
Atlanta, GA
2. PURPOSE AND LIMITATIONS:
  - a. This special permit authorizes the manufacture, mark, sale and use of UN specification packagings for the transportation in commerce of damaged, defective, or recalled lithium ion cells and batteries and lithium metal cells and batteries (including those contained in equipment) without shipping papers and certain marking and labeling. 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.
  - c. This special permit serves as an "exemption" under Chapter 7.9, Section 7.9.1 of the IMDG Code (see IMO MSC/Circ. 1075-Granting Exemptions from the Provisions of the IMDG Code) and as a "Competent Authority Approval" as defined under 49 CFR § 107.1.
  - d. In accordance with 49 CFR 107.107(a), party status may not be granted to a manufacturing permit. These packagings

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may be used in accordance with 49 CFR 173.22a.

3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR Subparts C through H of Part 172 and Chapters 1.3, 5.2, 5.3 and 5.4 of the IMDG Code in that shipping papers, marking, labeling, placarding, emergency response information, and training are not required and § 173.185(f) (3) in that more than one lithium cell or battery per package is authorized as specified herein.
5. BASIS: This special permit is based on the application of Call2Recycle, Inc. dated March 29, 2019 submitted in accordance with § 107.105 and the public preceding thereon and additional information dated July 29, 2019.
6. HAZARDOUS MATERIALS (49 CFR § 172.101):

<b>Hazardous Material Description</b>			
<b>Proper Shipping Name</b>	<b>Hazard Class/ Division</b>	<b>Identification Number</b>	<b>Packing Group</b>
Lithium ion batteries*	9	UN3480	N/A
Lithium ion batteries contained in equipment*	9	UN3481	N/A
Lithium metal batteries*	9	UN3090	N/A
Lithium metal batteries contained in equipment*	9	UN3091	N/A

\*Only damaged, defective, or recalled lithium ion or lithium metal cells or batteries, equipment containing these cells or batteries, and end-of-life waste lithium cells or batteries with a Watt-hour rating or a lithium content, as applicable, conforming to § 173.185(c) (1) (i), (ii) or (iv) may be transported under the terms of this special permit. For transportation by cargo vessel, only lithium ion or lithium metal cells or batteries and equipment containing these cells or batteries with a Watt-hour rating or a lithium content, as applicable, conforming to § 173.185(c) (1) (i) or (ii) may be transported under the terms of this special permit.

7. SAFETY CONTROL MEASURES:

a. OPERATIONAL CONTROLS:

(1) Cells, batteries, and these cells or batteries contained in equipment must have originally met the requirements for testing in accordance with the most recent edition of the UN Manual of Tests and Criteria prior to becoming damaged, defective, or recalled.

(2) Transportation by cargo vessel is only permitted when motor vehicle or rail shipments are not possible.

b. PACKAGING:

(1) INNER PACKAGING:

(i) Each cell or battery or each piece of equipment containing these cells or batteries must be individually packed in a non-metallic packaging that completely encloses the cell or battery or the piece of equipment containing the cells or batteries; or

(ii) Inner packaging is not required if the outer packaging is prepared in accordance with the packing instructions in paragraph 7.b.(2)(iii) below.

(2) OUTER PACKAGING:

(i) The completed inner package must be surrounded by cushioning material that is:

(A) Non-combustible, non-conductive, and absorbent;

(B) Granular thermally insulating fire suppressant referred to in the application dated March 29, 2019; or

(C) Pillowed granular thermally insulating fire suppressant referred to in the application dated March 29, 2019.

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(ii) The completed inner packaging must be placed in a UN specification metal, wooden, plastic box, or drum that meets the Packing Group I performance level.

(iii) If inner packaging is not used for each damaged, defective, recalled, or end-of-life waste cell or battery including the cell or battery contained in equipment, the outer packaging must be a UN specification metal, wooden or plastic box or drum that meets the Packing Group I performance level. Additionally, the outer packaging must be filled with the thermally insulating fire suppressant where the suppressant completely surrounds each cell or battery including end-of-life waste cells or batteries, or those contained in equipment by at least 2 inches of suppressant. Alternatively, the cells, batteries, or equipment may be placed within a thermally insulating fire suppression pillow affording a sufficient quantity of fire suppressant material. The thermally insulating fire suppressant, when utilized without an inner package, must be in sufficient quantity to absorb all of the potential release of electrolyte; suppress lithium cell/battery fires, heat and smoke; absorb the smoke, gases and flammable vapors and electrolytes during a thermal runaway incident; and will protect from the effects of shock and vibration and prevent movement of the cells, batteries and/or the equipment.

(iv) 4G fiberboard boxes may be used as the outer packaging only when thermally insulating fire suppressant is used and the packaging is in accordance with:

(A) Paragraphs 7.b.(1)(i) and 7.b.(2)(i)(B) when using granular thermally insulating fire suppressant;

(B) Paragraphs 7.b.(1)(i) and 7.b.(2)(i)(C) when using pillowed granular thermally insulating fire suppressant; or

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(C) Paragraph 7.b.(2)(iii) when using granular or pillowed granular thermally insulating fire suppressant without an inner packaging.

(3) Not more than 2 kg of lithium cells and batteries may be contained in a single package. However, a single cell or battery may be shipped within one (1) package provided the cell or battery has a mass of 5 kg or less.

(4) When utilizing the thermally insulating fire suppressant and packaged in accordance with paragraphs 7.b.(2)(iii) or 7.b.(2)(iv), up to 5 kg of lithium cells and batteries including those comingled with the end-of-life waste lithium cells or batteries may be contained in a single package.

(5) The package must conform to 49 CFR 173.185(c)(1)(vi).

c. MARKING: Each package covered under the terms of this special permit must be durably and legibly marked and displayed on a background of contrasting color with the following:

(1) Marked "DOT-SP 16563" in accordance with § 172.304.

(2) The words "Damaged/defective lithium ion battery" or "Damaged/defective lithium metal battery", as appropriate.

(3) The handling marking in § 173.185(c)(3)(i).

(4) For packages conforming to the requirements in § 173.185(c)(1)(i) or (ii), the words: "Batteries for Recycling: May Contain Damaged Lithium Batteries - FOR GROUND OR CARGO VESSEL TRANSPORT ONLY - FORBIDDEN FOR TRANSPORTATION BY AIRCRAFT".

(5) For packages conforming to the requirements in § 173.185(c)(1)(iv), the words: "Batteries for Recycling: May Contain Damaged Lithium Batteries - FOR GROUND TRANSPORT ONLY - FORBIDDEN FOR TRANSPORTATION BY AIRCRAFT AND CARGO VESSEL".



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(6) Additionally, each package may be marked with a QR code which when scanned provides a direct link to a specific URL where the most recent revision of the special permit can be viewed or downloaded. If the QR code is marked on the packaging, the URL must also be marked on the packaging.

d. Detailed closure, packing, and shipping instructions must be provided to individuals preparing shipments under the terms of the special permit. Persons offering packages for transportation must comply with the closure, packing, and shipping instructions accompanying the packaging.

8. 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 reoffer it for transportation provided no modification or change is made to the package and it is offered for transportation in conformance with this special permit and the HMR.

c. A current copy of this special permit must be maintained at each facility where the package is offered or reoffered for transportation.

d. 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 Safety Approvals and Permits Division for a specific manufacturing facility.

e. A current copy of this special permit must be maintained at each facility where the packaging is manufactured under this special permit. It must be made available to a DOT representative upon request.

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9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle, rail freight, and cargo vessel (see paragraph 7.a.(2) for restrictions).
10. MODAL REQUIREMENTS:
- a. A current copy of this special permit must be carried aboard each cargo vessel used to transport packages covered by this special permit.
  - b. For motor vehicle or rail shipments, a current copy of this special permit must be carried aboard each motor vehicle or locomotive unless the package is marked in accordance with paragraph 7.c.(6).
11. 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.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this special permit must receive adequate instruction on the requirements and conditions of this special permit.

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

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permit to be granted up to two years for new special permits and up to four years for renewals.

12. 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.:



for William Schoonover  
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: Steve H/kah



Leading the charge for recycling.™

**Call2Recycle® Program Participant:**

Welcome to Call2Recycle, Inc., North America’s premier product stewardship organization. We promote environmental sustainability by providing a battery and cellphone collection and recycling program. Call2Recycle applauds you for your commitment to diverting batteries from the landfill and ensuring their safe transportation for recycling.

**To get started, follow these simple steps:**

1. **READ** closely the following information and the safety guidelines printed on your collection box.
2. **TRAIN** everyone associated with the handling, collection or shipment of the batteries. (Free training materials are available at [www.call2recycle.org/safety](http://www.call2recycle.org/safety).)
3. **DISPLAY** the Call2Recycle collection box in a cool, dry location where it can be closely monitored.  
**Please do not remove the flame retardant liner affixed inside the box.**
4. **BEGIN** collecting batteries weighing 11 lbs (5 kgs) or less, and cellphones (with or without their batteries) in the box. The Call2Recycle program does not accept wet cell batteries.

**Rechargeable batteries**

- Lithium Ion (Li-Ion)
- Nickel Cadmium (Ni-Cd)
- Nickel Metal Hydride (Ni-MH)
- Nickel Zinc (Ni-Zn)
- Small Sealed Lead Acid (SSLA/Pb)

**Single-use (such as alkaline)\***

- AA, AAA, 9V, C, D and button cells
- Lithium primary

*\* Check to see if primary batteries are accepted at your collection site.*

5. **BAG OR TAPE** batteries\* to prevent terminals from touching, as recommended in the Call2Recycle guidelines.
  - Place only one battery (or cellphone with battery) per bag. You can substitute clear plastic bags, Ziploc® or produce bags. You can also use duct or non-conductive electrical tape to cover the positive (raised) terminal. Do not cover the brand name or battery chemistry.
  - If you have a defective or damaged battery, immediately place the battery in an absorbent, non-flammable material, such as kitty litter or sand. Contact Customer Service at 877.723.1297 for further instructions on special U.S. DOT shipping requirements.

*\* NOTE: Call2Recycle requires batteries to be shipped in compliance with U.S. DOT safety regulations, which require terminals of select battery types be protected. For the complete list of batteries with terminals that must be protected to comply with these requirements, please consult the Call2Recycle web site ([www.call2recycle.org/safety](http://www.call2recycle.org/safety)).*
6. **SHIP** the box when it is full up to 66 lbs (30 kgs) or within one year of the first date of collection, per EPA storage requirements. Please visually inspect the contents and remove foreign objects to avoid a safety incident. Automatic box replenishment is available for select collection sites. Contact Customer Service at 877.723.1297 for more information.

**Call2Recycle Safety & Compliance Advisory**

Call2Recycle has a strict safety policy to ensure all battery shipments arrive at a sorting facility without incident. Program participants that do not comply with these rules may face suspension or termination.

- Do not remove, manipulate or damage the flame retardant liner as it provides an additional layer of protection.
- Store the Call2Recycle collection box in a cool, dry place and where it is under supervision.
- Bag or tape batteries to prevent terminals from touching, which could cause a fire.
- Only use Call2Recycle containers or those that meet U.S. DOT requirements and are pre-approved by Call2Recycle.
- Call Customer Service at 877.723.1297 if you have a damaged battery.

## BATTERY / CELLPHONE COLLECTION & RECYCLING PROGRAM: Large Box Guidelines

Call2Recycle recommends shipping the box when it is full (up to 66 lbs.) or within one year of the accumulation start date, per EPA storage requirements.

### BUILD THE BOX

#### Step 1: Unpack



Remove the shrink-wrap. Do not remove or damage the flame retardant liner.

#### Step 2: Build the box



Pull and lift front flap.

#### Step 3: Fold



Insert header tabs into top slots, side flaps into back slots and neatly position bags.

### COLLECT BATTERIES & CELLPHONES

#### Step 4: Bag it or tape it



Place *each* required battery or cellphone in an appropriately sized bag. If no bags are available, cover the positive terminal with duct, electrical or another non-conductive tape.

#### Step 5: Seal it



Peel away backing from adhesive and fold flap over.

#### Step 6: Drop it



Deposit sealed bag or bags into the box. Write the accumulation start date on the back of the box at the time of first use.

### RETURN THE FULL BOX

#### Step 7: Prepare to ship



When max capacity (66 lbs/ 30 kgs) is reached or one year of accumulation has passed, release the header tabs and side flaps, remove backing from inside adhesive strips and fold down while inserting side flaps.

#### Step 8: Secure & ship



The pre-paid, pre-addressed return shipping label displays your assigned carrier – Do NOT cover with your own label(s). Write your return address and put the box out for that carrier's next pickup.

#### Contact us:

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

E-mail: [customerservice@call2recycle.org](mailto:customerservice@call2recycle.org)

Phone: 877.723.1297

**Charge Up Safety**  
[call2recycle.org/safety](http://call2recycle.org/safety)



# CERTIFICATE OF REGISTRATION

This is to certify that

**Call2Recycle, Inc.**

1000 Parkwood Circle, Suite 200 Atlanta , Georgia 30339 USA

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.**

Certificate No.: CERT-0117955  
File No.: 1698563  
Issue Date: August 8, 2018

Original Certification Date: August 7, 2018  
Certification Effective Date: August 7, 2018  
Certificate Expiry Date: December 21, 2020

Kevin Goodwin  
General Manager Technical Services  
SAI Global Assurance



**RESPONSIBLE**

Registered by:  
QMI-SAI Canada Limited (SAI Global), 20 Carlson Court, Suite 200, Toronto, Ontario M9W 7K6 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.qmi-saiqlobal.com/qmi\\_companies/](http://www.qmi-saiqlobal.com/qmi_companies/)

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





# 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 Management System**

which complies with the requirements of

**ISO 14001:2015**

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-0130273  
File No.: 1698563  
Issue Date: July 2, 2019

Original Certification Date: April 30, 2018  
Certification Effective Date: April 30, 2018  
Certification Expiry Date: October 7, 2020

Heather Mahon  
Global Head of Technical Services  
SAI Global Assurance





# ATTACHMENT TO CERTIFICATE OF REGISTRATION

These sites are registered under Certificate No: CERT-0130273 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.	April 30, 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.	May 10, 2018

These registrations are dependent on Call2Recycle, Inc. (File No. 1698563) maintaining their scope of registration to ISO 14001:2015

# RETRIEV

TECHNOLOGIES

## Audit Information

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



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## 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.

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<sup>1</sup> MOE permits are perpetual and do not require annual renewal.

## **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 *Retriev* 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







# Facility Permit

(Cover Page)



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	46 ppm

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

  
Sajid A. Barlas, Ph.D., P.Ag.  
for Director, *Environmental Management Act*  
Southern Interior Region

Page 1 of 10

Permit Number: 12975

## 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. 403-313-3365

**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 affected to cover as shown below:

NAMED INSURED: **Retriev 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

## **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**

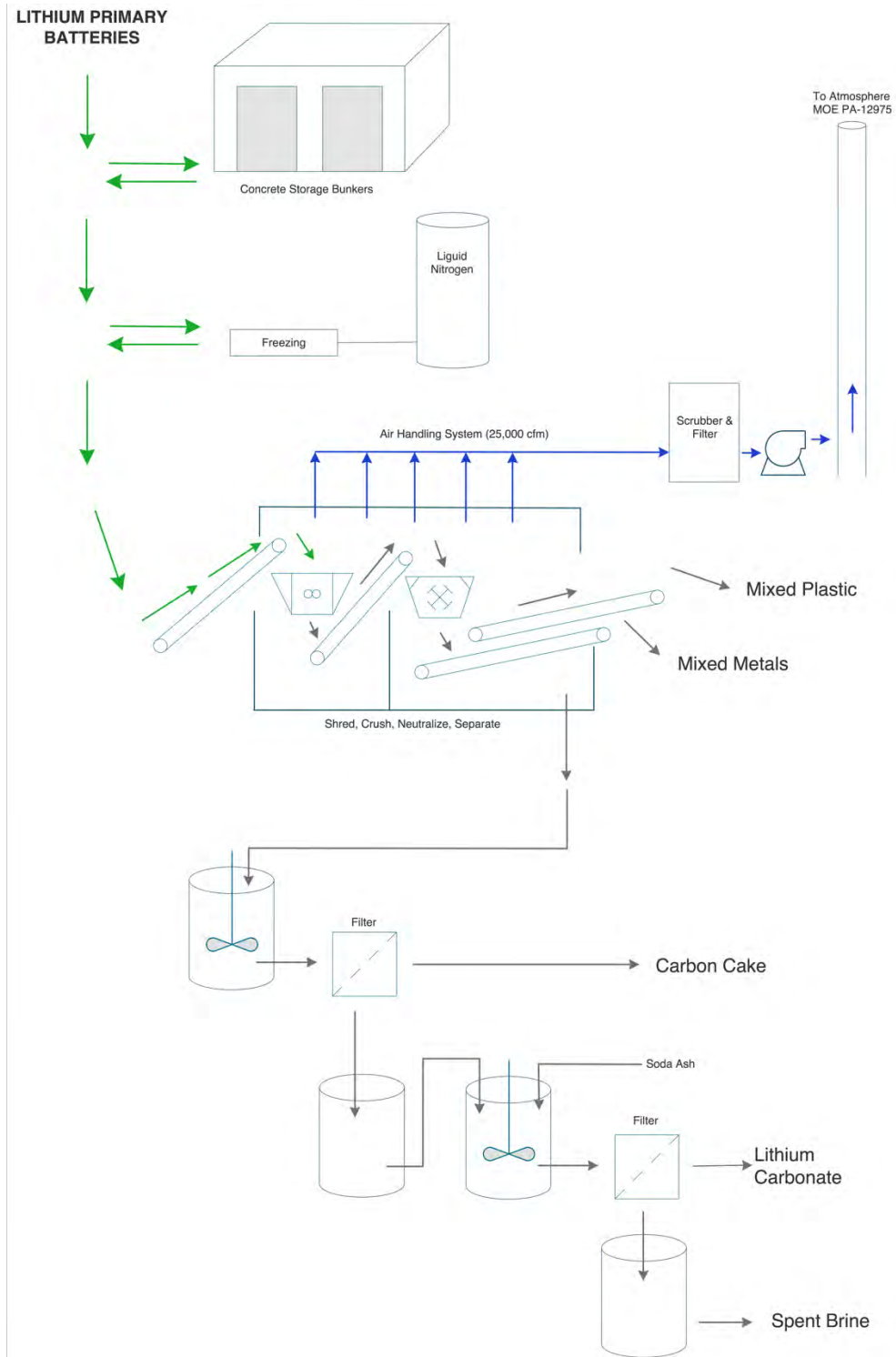
Lithium ion batteries, for example from HEV and EV's, are dismantled to the cell or module level, depending on construction. Various steel, electrical, and plastic components are recycled. Lithium-ion consumer batteries are processed as received after sorting.

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.

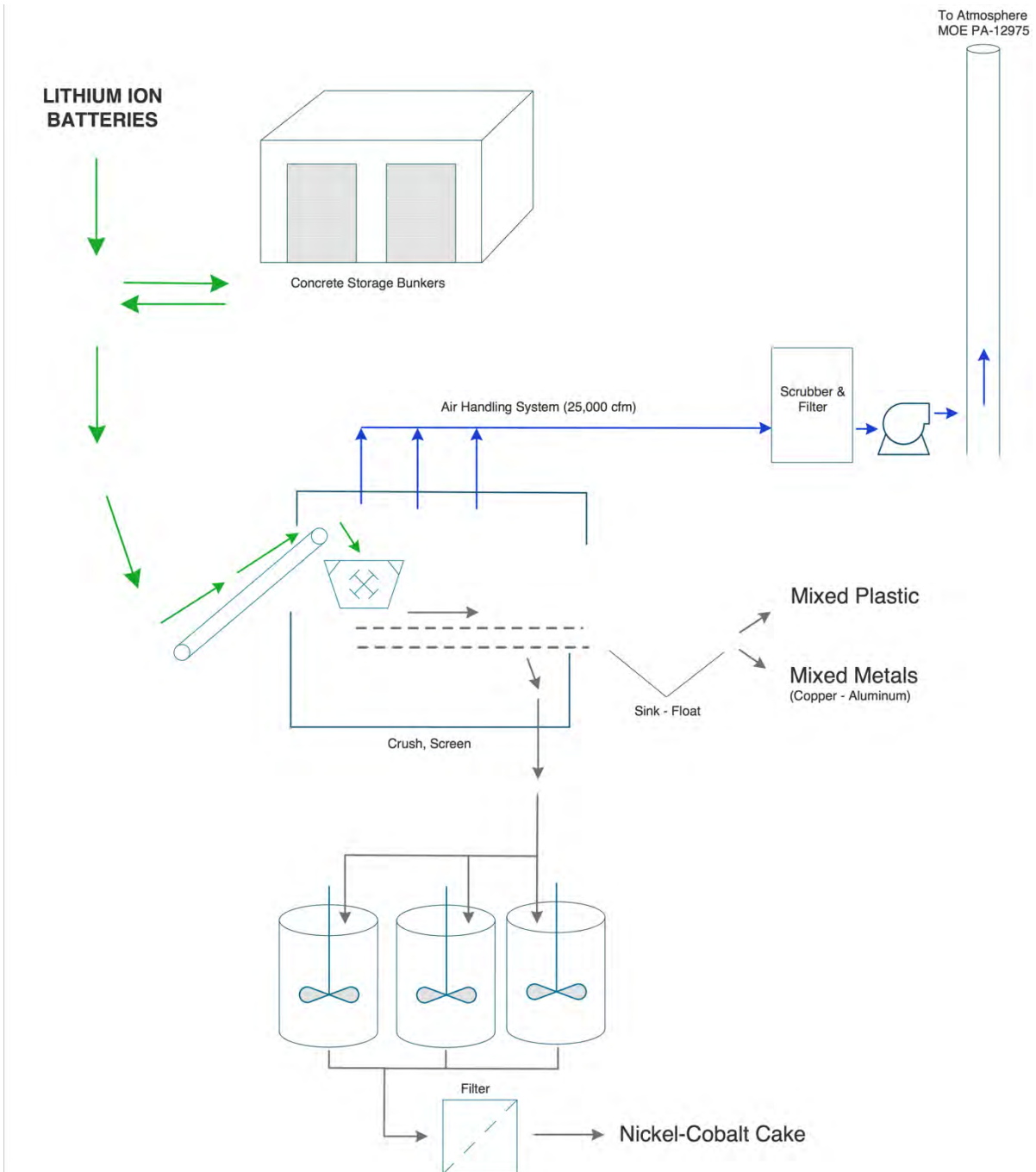
Solution from the filtration step contains the organic portion of the electrolyte and is reused in the crushing process. The organic components are consumed by microbes, which are added to holding tanks within the process.

# Operations Diagrams

## Lithium Primary Process



# Lithium Ion Process





## 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 - Retrieiv 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**

Retrieiv 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 22A, 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. (PJR)  
755 West Big Beaver Road, Suite 1340  
Troy, Michigan 48084  
(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.*



Terry Boboige, President  
Perry Johnson Registrars, Inc. (PJR)  
755 West Big Beaver Road, Suite 1340  
Troy, Michigan 48084  
(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:  
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 22A, 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 48084  
(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



**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.



<b>Corporate &amp; Permit Information</b>	
<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
<b>Material Handling – Battery Recycling</b>	
<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, withthe exception of alkaline batteries.</li> </ul>	
<b>Processing Capacity and Capabilities</b>	
<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:mnp@azdeq.gov">mnp@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	
<p>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.</p>	
Pre-Work Training	<p>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.</p>
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	<p>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.</p>
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	<p>Training, testing, and licensing as required by state and federal regulations</p>

### 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. <b>BATTERY SOLUTIONS, LLC</b>	
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 <b>one</b> of the following seven boxes.  <input type="checkbox"/> Individual/sole proprietor or single-member LLC <input type="checkbox"/> C Corporation <input type="checkbox"/> S Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Trust/estate <input checked="" type="checkbox"/> Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=Partnership) ▶ <b>P</b> <b>Note:</b> 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 <b>not</b> 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. <input type="checkbox"/> 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) _____  <i>(Applies to accounts maintained outside the U.S.)</i>
5 Address (number, street, and apt. or suite no.) See instructions. <b>4930 HOLTZ DR</b>	Requester's name and address (optional)
6 City, state, and ZIP code <b>WIXOM, MI 48393</b>	
7 List account number(s) here (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.

<b>Social security number</b>													
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> <td style="border: 1px solid black; width: 20px; height: 20px;"></td> </tr> </table>													
<b>or</b>													
<b>Employer identification number</b>													
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="border: 1px solid black; width: 20px; height: 20px; text-align: center;">9</td> <td style="border: 1px solid black; width: 20px; height: 20px; text-align: center;">0</td> <td style="border: 1px solid black; width: 20px; height: 20px; text-align: center;">-</td> <td style="border: 1px solid black; width: 20px; height: 20px; text-align: center;">0</td> <td style="border: 1px solid black; width: 20px; height: 20px; text-align: center;">9</td> <td style="border: 1px solid black; width: 20px; height: 20px; text-align: center;">1</td> <td style="border: 1px solid black; width: 20px; height: 20px; text-align: center;">0</td> <td style="border: 1px solid black; width: 20px; height: 20px; text-align: center;">8</td> <td style="border: 1px solid black; width: 20px; height: 20px; text-align: center;">6</td> <td style="border: 1px solid black; width: 20px; height: 20px; text-align: center;">0</td> </tr> </table>	9	0	-	0	9	1	0	8	6	0			
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.

<b>Sign Here</b>	Signature of U.S. person ▶	Date ▶ <b>1/2/19</b>
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## 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: **SGQ 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 [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)		
<b>Latitude Coordinate:</b>	42.52451	
<b>Longitude Coordinate:</b>	-83.56485	
<b>Collection Method:</b>	Lat/Long Interpolation	

<b>Receives All Waste?:</b> No
<b>Railroad?:</b> No
<b>Facility on Indian Reservation Land?:</b> No
<b>Utilization Activities:</b>
<b>Scrap Tires Activities:</b>
<b>Scrap Tires Acres:</b>
<b>NAICS Codes (up to four six-digit codes):</b>
(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@BATTERY SOLUTIONS.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 <b>GENERATES UNIVERSAL WASTE</b>
		- JW

<p><b>SEND COMPLETED FORM TO:</b> The Appropriate State or Regional Office.</p>	<p><b>United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM</b></p>														
<p><b>1. Reason for Submittal</b></p> <p>MARK ALL BOX(ES) THAT APPLY</p>	<p><b>Reason for Submittal:</b></p> <p><input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)</p> <p><input checked="" type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location)</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application</p> <p><input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below)</p> <p><input type="checkbox"/> Site was a TSD facility and/or generator of &gt;1,000 kg of hazardous waste, &gt;1 kg of acute hazardous waste, or &gt;100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)</p>														
<p><b>2. Site EPA ID Number</b></p>	<p>EPA ID Number <table border="1" style="display: inline-table; border-collapse: collapse;"> <tr> <td style="padding: 2px;">A</td><td style="padding: 2px;">Z</td><td style="padding: 2px;">R</td><td style="padding: 2px;">0</td><td style="padding: 2px;">0</td><td style="padding: 2px;">0</td><td style="padding: 2px;">5</td><td style="padding: 2px;">1</td><td style="padding: 2px;">9</td><td style="padding: 2px;">2</td><td style="padding: 2px;">5</td><td style="padding: 2px;">6</td> </tr> </table></p>			A	Z	R	0	0	0	5	1	9	2	5	6
A	Z	R	0	0	0	5	1	9	2	5	6				
<p><b>3. Site Name</b></p>	<p>Name: Battery Solutions, LLC</p>														
<p><b>4. Site Location Information</b></p>	<p>Street Address: 618 E. Auto Center Drive, Ste 111</p>														
	<p>City, Town, or Village: Mesa</p>		<p>County: Maricopa</p>												
	<p>State: AZ</p>	<p>Country: US</p>	<p>Zip Code: 85204</p>												
<p><b>5. Site Land Type</b></p>	<p><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</p>														
<p><b>6. NAICS Code(s) for the Site (at least 5-digit codes)</b></p>	<p>A. <table border="1" style="display: inline-table; border-collapse: collapse;"> <tr> <td style="padding: 2px;">4</td><td style="padding: 2px;">2</td><td style="padding: 2px;">3</td><td style="padding: 2px;">9</td><td style="padding: 2px;">3</td><td style="padding: 2px;">0</td> </tr> </table></p>	4	2	3	9	3	0	<p>C. <table border="1" style="display: inline-table; border-collapse: collapse;"> <tr> <td style="width: 20px;"> </td><td style="width: 20px;"> </td><td style="width: 20px;"> </td><td style="width: 20px;"> </td><td style="width: 20px;"> </td><td style="width: 20px;"> </td> </tr> </table></p>							
4	2	3	9	3	0										
	<p>B. <table border="1" style="display: inline-table; border-collapse: collapse;"> <tr> <td style="padding: 2px;">5</td><td style="padding: 2px;">6</td><td style="padding: 2px;">2</td><td style="padding: 2px;">1</td><td style="padding: 2px;">1</td><td style="padding: 2px;">9</td> </tr> </table></p>	5	6	2	1	1	9	<p>D. <table border="1" style="display: inline-table; border-collapse: collapse;"> <tr> <td style="width: 20px;"> </td><td style="width: 20px;"> </td><td style="width: 20px;"> </td><td style="width: 20px;"> </td><td style="width: 20px;"> </td><td style="width: 20px;"> </td> </tr> </table></p>							
5	6	2	1	1	9										
<p><b>7. Site Mailing Address</b></p>	<p>Street or P.O. Box: 5900 Brighton Pines Court</p>														
	<p>City, Town, or Village: Howell</p>														
	<p>State: MI</p>	<p>Country: US</p>	<p>Zip Code: 48843</p>												
<p><b>8. Site Contact Person</b></p>	<p>First Name: Brian</p>	<p>MI:</p>	<p>Last: Gallentine</p>												
	<p>Title: VP Operations</p>														
	<p>Street or P.O. Box: 5900 Brighton Pines Court</p>														
	<p>City, Town or Village: Howell</p>														
	<p>State: MI</p>	<p>Country: US</p>	<p>Zip Code: 48843</p>												
	<p>Email: bgallentine@batterysolutions.com</p>														
	<p>Phone: 248-446-3001</p>	<p>Ext.:</p>	<p>Fax: 248-446-1927</p>												
<p><b>9. Legal Owner and Operator of the Site</b></p>	<p>A. Name of Site's Legal Owner: Metro East Valley Holdings, LLC</p>		<p>Date Became Owner: 7/8/2015</p>												
	<p>Owner Type: <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</p>														
	<p>Street or P.O. Box: 1500 N. Priest Drive, #132</p>														
	<p>City, Town, or Village: Tempe</p>		<p>Phone: 602-452-2570</p>												
	<p>State: AZ</p>	<p>Country: US</p>	<p>Zip Code: 85251</p>												
	<p>B. Name of Site's Operator: Battery Solutions, LLC</p>		<p>Date Became Operator: 9/1/2016</p>												
	<p>Operator Type: <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</p>														

**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 university

Y  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.




## 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

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**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:

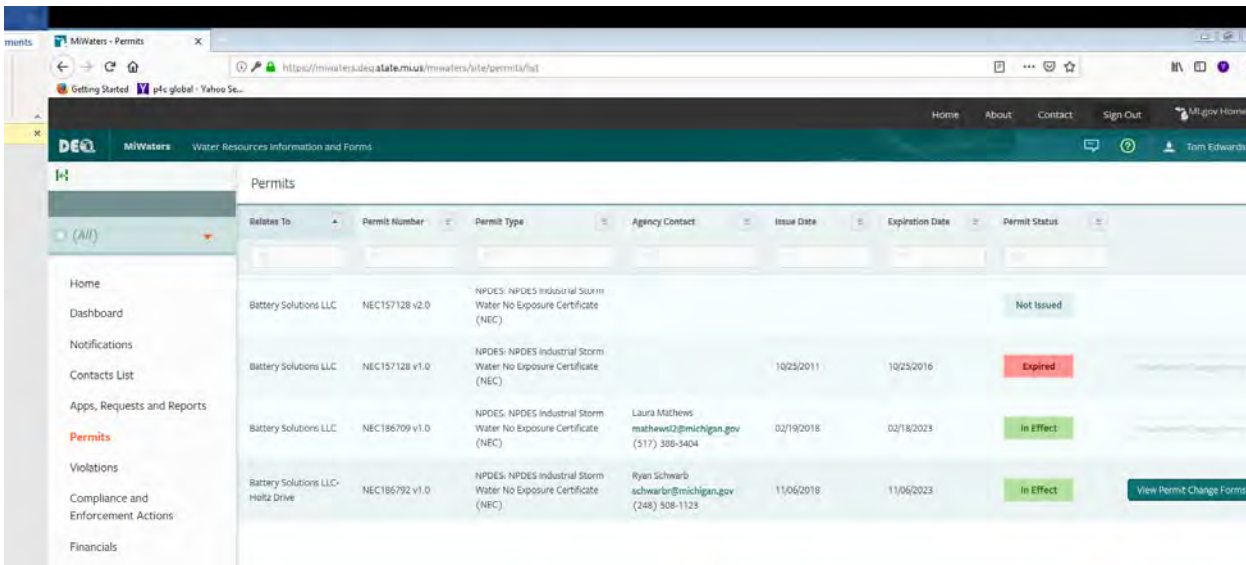
Submission Form: No Exposure Certification (NEC) for Exclusion of Coverage under the NPDES Storm Water Discharges Associated with Industrial Activity  
Submission Reference Number: HNJ-3Y2Q-WJH0Q  
Site Name: Battery Solutions LLC-Holtz Drive  
DEQ Processor: Karen Gutting

**New Status: Completed**

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

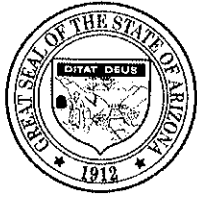
**Expiration Date : 11/06/2023**

This is an automated notification generated by the MiWaters system.



The screenshot shows the MiWaters Permits system interface. The table displays the following data:

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 Schwarz schwarzr@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 GALLENINE  
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)

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**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', is written over a horizontal line.

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@mesaaaz.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 #: ENVCI8-04168 SIC Code: 5093

Date of Inspection:	
<u>9/13/18</u>	
Type of Site:	
Industrial	<input checked="" type="checkbox"/>
Commercial	<input type="checkbox"/>
Residential	<input type="checkbox"/>

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>AZRNEED-1213 (NEC) 11/30/16</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:

- LARGE QUANTITY HANDFUL of UNID. WASTE
- BATTERY RECYCLING SORTING FACILITY
- ALL DRY MATERIAL, IN BOXES OR 55 GAL DRUMS
- NO MATERIAL/WASTE EXPOSED TO STORMWATER (ALL INSIDERS)
- NO CITY SE STORMWATER SEWER SYSTEM CATCH BASIN PRESENT.

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: \_\_\_\_\_


SIGN: \_\_\_\_\_

PHONE #: ( ) - -

PHONE #: (480) 644 - 3520

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

EMAIL: michael.baez@mesaaz.gov

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



# 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>

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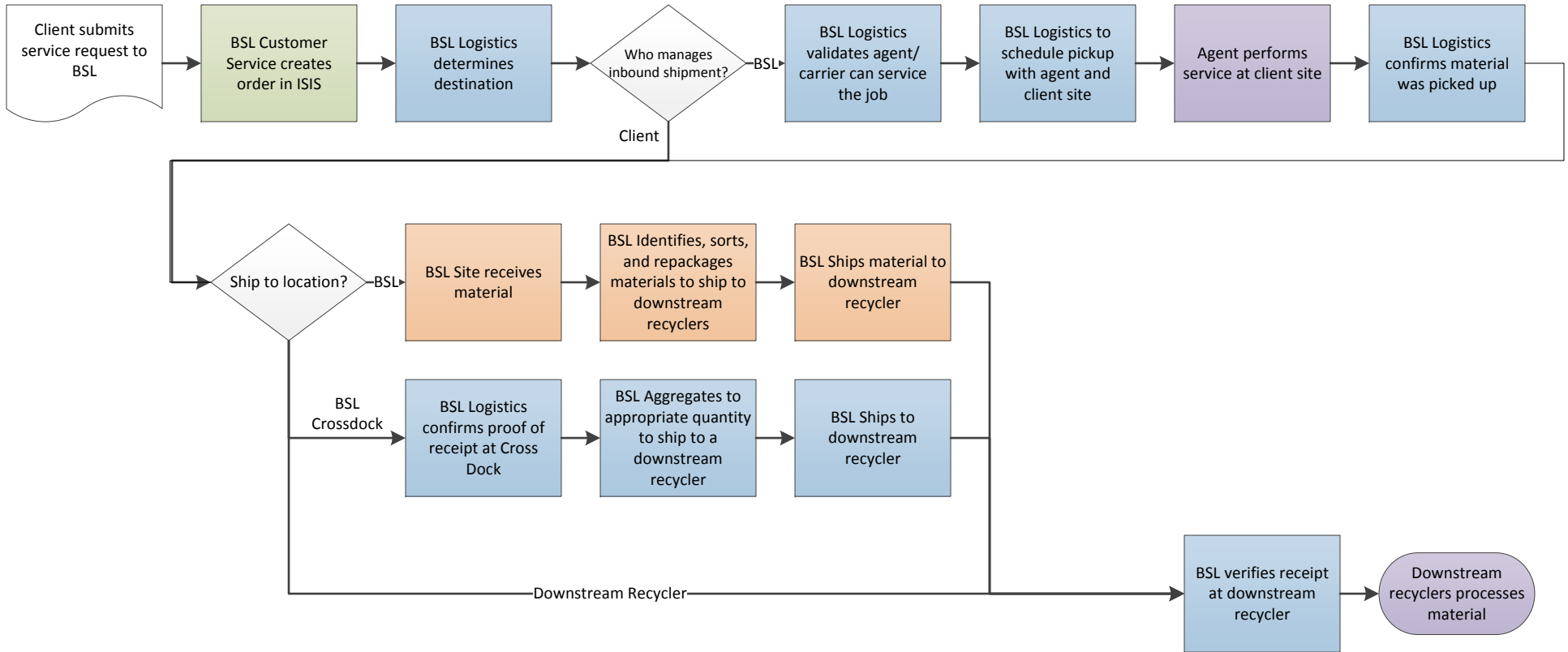
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# Battery Solutions Process Flow

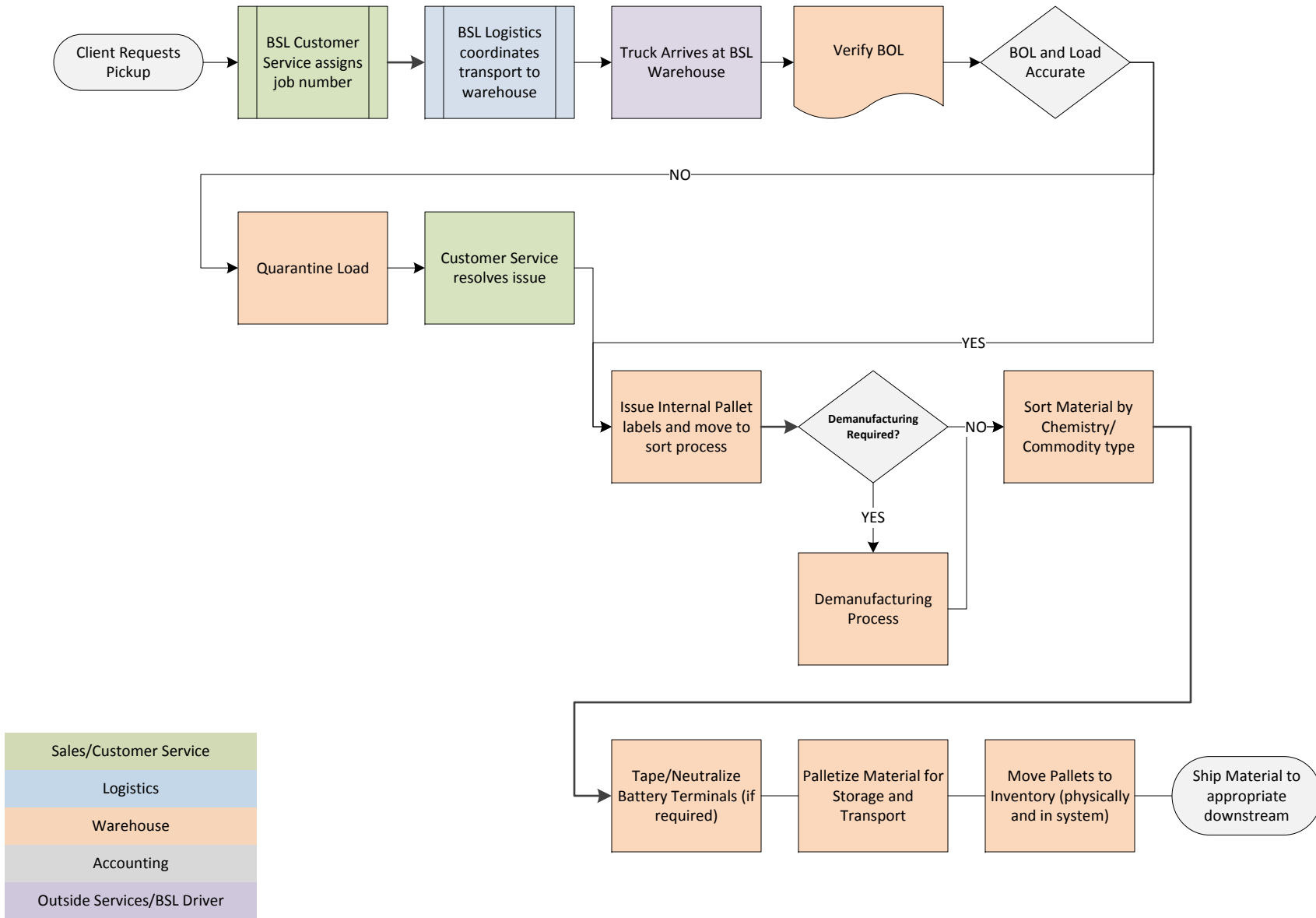
Material Chain of Custody






# Battery Solutions Process Flow

## Site Material Handling Process



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

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## 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





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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



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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



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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



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### 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.

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**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

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**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.
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**NSF International Strategic Registrations**

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**CHWMEG, Inc.**

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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,

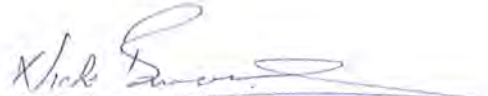
**The 2019 CHWMEG, Inc. Board of Directors**



Kevin Bloomer  
CHWMEG, Inc. Chair



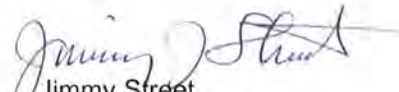
Michael Cakouros  
CHWMEG, Inc. Vice-Chair



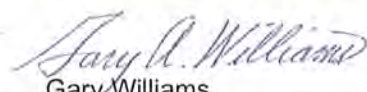
Nick Burrows, Ph.D.  
CHWMEG, Inc. Treasurer



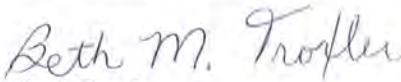
Doug Duncan  
CHWMEG, Inc. Secretary



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)



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## 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.



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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





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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.



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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:





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- 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***

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RIOS:2016 Recycling Industry Operating Standard

R2:2013 Responsible Recycling Practices

# OSHA's Form 300A (Rev. 01/2004)

## Summary of Work-Related Injuries and Illnesses

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>5</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>1</u>
(K)	(L)

### Injury and Illness Types

Total number of... (M)	(1) Injury	(2) Skin Disorder	(3) Respiratory Condition	(4) Poisoning	(5) Hearing Loss	(6) All Other Illnesses
	<u>6</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<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 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 80

Total hours worked by all employees last year 101,998

Sign here Thomas Bjarnemark

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 CEO  
Company executive Title

248-446-3001 1/9/2019  
Phone 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 P. Jones  
Company executive

\_\_\_\_\_  
CEO  
Title

248-446-3001  
Phone

1/31/2019  
Date



SUMMARY OF WORK-RELATED INJURIES AND ILLNESSES

Year 20 18

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.

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.

Number of Cases

Table with 4 columns: Total number of deaths (G), Total number of cases with days away from work (H), Total number of cases with job transfer or restriction (I), Total number of other recordable cases (J). All values are 0.

Number of Days

Table with 2 columns: Total number of days away from work (K), Total number of days of job transfer or restriction (L). Both values are 0.

Injury and Illness Types

Table with 6 categories: (1) Injury, (2) Skin Disorder, (3) Respiratory Conditions, (4) Poisonings, (5) Hearing Loss, (6) All Other Illnesses. All values are 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 50 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information.

Establishment information

Your establishment name Battery Solutions Recovery, LLC
Street 7266 Kensington Road
City Brighton State MI Zip 48116
Industry description 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

Handwritten signature of Adam Hancock

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

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>				<b>Owner/Operator Details</b>	
MI SARA ID:	20237	LEPC:	LIVINGSTON COUNTY LEPC	Name:	Battery Solutions, LLC
Facility Name:	Howell	Lat/Long:	42.56689/-83.8351	Address:	5900 Brighton Pines Ct Howell, MI 48843, United States
Company Name:	Battery Solutions, LLC	Maximum Occupants:	181	Phone:	248-446-3001      Email: tom@batterysolutions.com
Physical Location:	5900 Brighton Pines Court, Howell, MI 48843	Nature of Business:	Spent Battery Collection, sorting and packaging	<b>Parent Company Details</b>	
County:	LIVINGSTON	NAICS Code:	423930	Name:	Battery Solutions, LLC
Fire Department:	Brighton Area FD	SIC Code:	5093	Dun and Brad No:	849307608
Phone:	248-446-3001	Dun and Brad No:	849307608	Address:	5900 Brighton Pines Court Howell, MI 48843, United States
<input checked="" type="checkbox"/> Manned <input type="checkbox"/> Unmanned				Phone:	248-446-5633      Email: tom@batterysolutions.com
Email:	tom@batterysolutions.com	Facility ID:	20553		

Subject to EPCRA Section 312 (Annual Inventory)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>Tier II Information Contact</b>
Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Name:
Subject to Section 112r of Clean Air Act (CAA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Title:
RMP Facility ID:		Phone:
Subject to EPCRA Section 313 (Toxic Release Inventory - TRI)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Email:
TRI Facility ID:		24 Hr.Phone:

<b>Mailing Address</b>				<b>Facility Emergency Planning Coordinator</b>	
Company Name:	Battery Solutions	Name:	Steve Novack	Title:	Warehouse Sort Manager
Attention:	Don Lynch	Phone:	248-446-3001	24 Hr.Phone:	734-658-4373
Street Address 1:	5900 Brighton Pines Court	Email:	snovack@batterysolutions.com		
Street Address 2:					
City:	Howell	State:	MI		
Zip:	48843	Phone:	248-446-3001		
Country:	United States				

Emergency Contacts				
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.				<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 Respons	
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		

# 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: <b>LEAD ACID BATTERY</b> 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	[1]Ambient pressure	[4]Ambient temperature	ON PALLETS ON RACKS			
	[R]Other	[1]Ambient pressure	[4]Ambient temperature	on pallets on racks			394492
	[R]Other	[1]Ambient pressure	[4]Ambient temperature	on pallets in rack			
	[R]Other	[1]Ambient pressure (Confidential)	[4]Ambient temperature (Confidential)	in equipment (Confidential)	(Confidential)		11370 (Confidential)
	Desc: Used in Forklifts and floor scrubbers (Confidential)						

**MIXTURE COMPONENTS**

Chemical Name	%	CAS #	EHS	EHS Name	Max Daily Amount (lbs)	Max Daily Amount Code
<b>SULFURIC ACID</b>	8	<b>7664-93-9</b>	<input checked="" type="checkbox"/>	SULFURIC ACID	38780.88	07
<b>LEAD</b>	66	<b>7439-92-1</b>	<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"/> Chemical Name: <b>LITHIUM BATTERY</b> EHS: <input type="checkbox"/> Contains EHS: <input checked="" type="checkbox"/> Exceeds TPO: <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	<b>Container Type</b>	<b>Pressure</b>	<b>Temperature</b>	<b>Storage Location</b>	<b>Description</b>	<b>Is Confidential</b>	<b>Max Amt At Location(lbs)</b>
	[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							
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"/> Chemical Name: <b>NICKEL CADMIUM BATTERY (WET)</b> 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	<table border="1"> <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>[R]Other Desc:</td> <td>[1]Ambient pressure</td> <td>[4]Ambient temperature</td> <td>On Pallets on 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)	[R]Other Desc:	[1]Ambient pressure	[4]Ambient temperature	On Pallets on Racks			
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"/> CAS #: N/A Trade Secret: <input type="checkbox"/> Chemical Name: <b>NICKEL CADMIUM BATTERY(Dry)</b> 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	<b>Container Type</b>	<b>Pressure</b>	<b>Temperature</b>	<b>Storage Location</b>	<b>Description</b>	<b>Is Confidential</b>	<b>Max Amt At Location(lbs)</b>
	[K]Box	[1]Ambient pressure	[4]Ambient temperature	ON PALLETS IN RACKS			

**MIXTURE COMPONENTS**

Chemical Name	%	CAS #	EHS	EHS Name	Max Daily Amount (lbs)	Max Daily Amount Code
<b>CADMIUM OXIDE</b>	28	<b>1306-19-0</b>	<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**

*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**

*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**

*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**

Fire Department with  
 Jurisdiction: **Mesa Fire Department**

Tribal Name, if on Indian Land: **Not On Tribal Land**

*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 Secret

*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
<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>

*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 Secret

*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
<b>R- Other</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>1310-58-3</b></p> <p>Chemical Name: <b>potassium hydroxide,</b></p> <p>EHS: <input checked="" type="checkbox"/></p> <p>EHS Name: <b>Potassium Hydroxide</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 Scret</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 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 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 type="checkbox"/> Hazard Not Otherwise Classified (HNOC)</p>	<p><i>Inventory (6)</i></p> <p>Max Daily Amount: <b>5</b></p> <p>Actual Max Daily Amount (lbs): <b>5412</b></p> <p>Avg. Daily Amount: <b>4</b></p> <p>Actual Avg. Daily Amount (lbs): <b>3388</b></p> <p>No. of Days on Site Per Year: <b>365</b></p>
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*Storage Codes and Locations (7)*

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>

<p><i>Chemical Description (3)</i></p> <p>CAS: <b>7446-09-5</b></p> <p>Chemical Name: <b>sulfur dioxide</b></p> <p>EHS: <input checked="" type="checkbox"/></p> <p>EHS Name: <b>Sulfur Dioxide</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 Scret</p>	<p><i>Physical Hazards (4)</i></p> <p>Check all that apply:</p> <p><input checked="" 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 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 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 type="checkbox"/> Hazard Not Otherwise Classified (HNOC)</p>	<p><i>Inventory (6)</i></p> <p>Max Daily Amount: <b>9</b></p> <p>Actual Max Daily Amount (lbs): <b>76167</b></p> <p>Avg. Daily Amount: <b>8</b></p> <p>Actual Avg. Daily Amount (lbs): <b>57265</b></p> <p>No. of Days on Site Per Year: <b>365</b></p>
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*Storage Codes and Locations (7)*

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>7719-09-7</b></p> <p>Chemical Name: <b>thionyl chloride</b></p> <p>EHS: <input checked="" type="checkbox"/></p> <p>EHS Name: <b>Lithium Chloride</b></p> <p>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</p>	<p><i>Physical Hazards (4)</i></p> <p>Check all that apply:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Flammable (gases, aerosols, liquids, or solids)</li> <li><input type="checkbox"/> Gas under pressure</li> <li><input type="checkbox"/> Explosive</li> <li><input type="checkbox"/> Self-heating</li> <li><input type="checkbox"/> Pyrophoric (liquid or solid)</li> <li><input type="checkbox"/> Pyrophoric Gas</li> <li><input type="checkbox"/> Corrosive to metal</li> <li><input type="checkbox"/> Oxidizer (liquid, solid, or gas)</li> <li><input type="checkbox"/> Organic peroxide</li> <li><input type="checkbox"/> Self-reactive</li> <li><input type="checkbox"/> In contact with water emits flammable gas</li> <li><input type="checkbox"/> Combustible Dust</li> <li><input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC)</li> </ul>	<p><i>Health Hazards (5)</i></p> <p>Check all that apply:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Carcinogenicity</li> <li><input type="checkbox"/> Acute toxicity (any route of exposure)</li> <li><input type="checkbox"/> Reproductive toxicity</li> <li><input checked="" type="checkbox"/> Skin Corrosion or Irritation</li> <li><input checked="" type="checkbox"/> Respiratory or Skin Sensitization</li> <li><input checked="" type="checkbox"/> Serious eye damage or eye irritation</li> <li><input type="checkbox"/> Specific target organ toxicity (single or repeated exposure)</li> <li><input type="checkbox"/> Aspiration Hazard</li> <li><input type="checkbox"/> Germ cell mutagenicity</li> <li><input type="checkbox"/> Simple Asphyxiant</li> <li><input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC)</li> </ul>	<p><i>Inventory (6)</i></p> <p style="text-align: right;">Max Daily Amount: <b>5</b></p> <p style="text-align: right;">Actual Max Daily Amount (lbs): <b>5078</b></p> <p style="text-align: right;">Avg. Daily Amount: <b>4</b></p> <p style="text-align: right;">Actual Avg. Daily Amount (lbs): <b>3818</b></p> <p style="text-align: right;">No. of Days on Site Per Year: <b>365</b></p>
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*Storage Codes and Locations (7)*

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>7439-93-2</b></p> <p>Chemical Name: <b>lithium, metallic</b></p> <p>EHS: <input type="checkbox"/></p> <p>EHS Name:</p> <p>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</p>	<p><i>Physical Hazards (4)</i></p> <p>Check all that apply:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Flammable (gases, aerosols, liquids, or solids)</li> <li><input type="checkbox"/> Gas under pressure</li> <li><input type="checkbox"/> Explosive</li> <li><input type="checkbox"/> Self-heating</li> <li><input type="checkbox"/> Pyrophoric (liquid or solid)</li> <li><input checked="" type="checkbox"/> Pyrophoric Gas</li> <li><input type="checkbox"/> Corrosive to metal</li> <li><input type="checkbox"/> Oxidizer (liquid, solid, or gas)</li> <li><input type="checkbox"/> Organic peroxide</li> <li><input type="checkbox"/> Self-reactive</li> <li><input checked="" type="checkbox"/> In contact with water emits flammable gas</li> <li><input type="checkbox"/> Combustible Dust</li> <li><input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC)</li> </ul>	<p><i>Health Hazards (5)</i></p> <p>Check all that apply:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Carcinogenicity</li> <li><input type="checkbox"/> Acute toxicity (any route of exposure)</li> <li><input type="checkbox"/> Reproductive toxicity</li> <li><input checked="" type="checkbox"/> Skin Corrosion or Irritation</li> <li><input type="checkbox"/> Respiratory or Skin Sensitization</li> <li><input type="checkbox"/> Serious eye damage or eye irritation</li> <li><input type="checkbox"/> Specific target organ toxicity (single or repeated exposure)</li> <li><input type="checkbox"/> Aspiration Hazard</li> <li><input type="checkbox"/> Germ cell mutagenicity</li> <li><input type="checkbox"/> Simple Asphyxiant</li> <li><input checked="" type="checkbox"/> Hazard Not Otherwise Classified (HNOC)</li> </ul>	<p><i>Inventory (6)</i></p> <p style="text-align: right;">Max Daily Amount: <b>6</b></p> <p style="text-align: right;">Actual Max Daily Amount (lbs): <b>12695</b></p> <p style="text-align: right;">Avg. Daily Amount: <b>5</b></p> <p style="text-align: right;">Actual Avg. Daily Amount (lbs): <b>9544</b></p> <p style="text-align: right;">No. of Days on Site Per Year: <b>365</b></p>
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*Storage Codes and Locations (7)*

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"/> Trade Scret    <input type="checkbox"/> Gas</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>
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*Storage Codes and Locations (7)*

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

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>INSURER(S) AFFORDING COVERAGE</b>	
<b>INSURED</b> Battery Solutions, LLC 4930 Holtz Drive Milson, MI 48393	<b>INSURER A:</b> AIG Property Casualty Company <b>NAIC #</b> 19402	
	<b>INSURER B:</b>	
	<b>INSURER C:</b>	
	<b>INSURER D:</b>	
	<b>INSURER E:</b>	
	<b>INSURER F:</b>	

**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	ADDL INSD	SUBR WVD	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 GENL 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	<b>AUTOMOBILE LIABILITY</b> <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"/> RETENT ION \$	Y		EGU 13570715	09/01/2019	09/01/2020	EACH OCCURRENCE \$ 15,000,000 AGGREGATE \$ 15,000,000 \$
	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below		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)

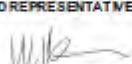
RE: Mesa Facility 618 East Auto Center Drive Suite #111 Mesa, AZ 85204

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 
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AGENCY CUSTOMER ID: \_\_\_\_\_  
LOC #: \_\_\_\_\_



### ADDITIONAL REMARKS SCHEDULE

AGENCY Willis Towers Watson Southeast, Inc. aka 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**  
**INSURER A :** New Hampshire Ins Co **NAIC #** 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 <input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> OCCUR						EACH OCCURRENCE	\$
							DAMAGE TO RENTED PREMISES (Ea occurrence)	\$
							MED EXP (Any one person)	\$
							PERSONAL & ADV INJURY	\$
	GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER						GENERAL AGGREGATE	\$
							PRODUCTS - COMP/OP AGG	\$
								\$
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO OWNED AUTOS ONLY <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident)	\$
							BODILY INJURY (Per person)	\$
							BODILY INJURY (Per accident)	\$
							PROPERTY DAMAGE (Per accident)	\$
								\$
	UMBRELLA LIAB <input type="checkbox"/> OCCUR EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE						EACH OCCURRENCE	\$
	DEC <input type="checkbox"/> RETENTION \$						AGGREGATE	\$
A	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	WC 080372818 AZ	7/1/2019	7/1/2020	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER
							E.L. EACH ACCIDENT	\$ 2,000,000
							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.

**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*

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# 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).

<b>PRODUCER</b> Aon Risk Services, Inc of Florida 1001 Brickell Bay Drive, Suite #1100 Miami, FL 33131-4937	<b>CONTACT NAME:</b> Aon Risk Services, Inc of Florida	
	<b>PHONE (A/C, No, Ext):</b> 800-743-8130	<b>FAX (A/C, No):</b> 800-522-7514
<b>EMAIL ADDRESS:</b> ADP.COI.Center@Aon.com		
<b>INSURER(S) AFFORDING COVERAGE</b>		<b>NAIC #</b>
INSURER A : New Hampshire Ins Co		23841
<b>INSURED</b> ADP TotalSource NH XXVIII, Inc. 10200 Sunset Drive Miami, FL 33173 <b>ALTERNATE EMPLOYER</b> Battery Solutions, LLC 4930 Holtz Drive, Wixom, MI 48393	<b>INSURER B :</b>	
	<b>INSURER C :</b>	
	<b>INSURER D :</b>	
	<b>INSURER E :</b>	
	<b>INSURER F :</b>	

**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 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 <input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> OCCUR  GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER						EACH OCCURRENCE \$ DAMAGE TO RENTED PREMISES (Ea occurrence) \$ MED EXP (Any one person) \$ PERSONAL & ADV INJURY \$ GENERAL AGGREGATE \$ PRODUCTS - COMP/OP AGG \$ \$	
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO OWNED AUTOS ONLY <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$	
	<input type="checkbox"/> UMBRELLA LIAB <input type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DEC <input type="checkbox"/> RETENTION \$						EACH OCCURRENCE \$ AGGREGATE \$	
A	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N	N/A	WC 080371943 MI	7/1/2019	7/1/2020	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER	E.L. EACH ACCIDENT \$ 2,000,000 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 <i>Aon Risk Services, Inc of Florida</i>
---	---

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**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

A handwritten signature in black ink, appearing to read "Doug Smith", written over a horizontal line.

Director, Commercial Sales Support, Battery Solutions  
Date: 1/07/2019

## 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



**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

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**



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- 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.

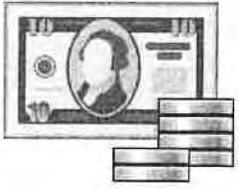
If you have any questions please contact our Milford Township office for clarification, (248) 685-8731.

Thank you,

Timothy 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**

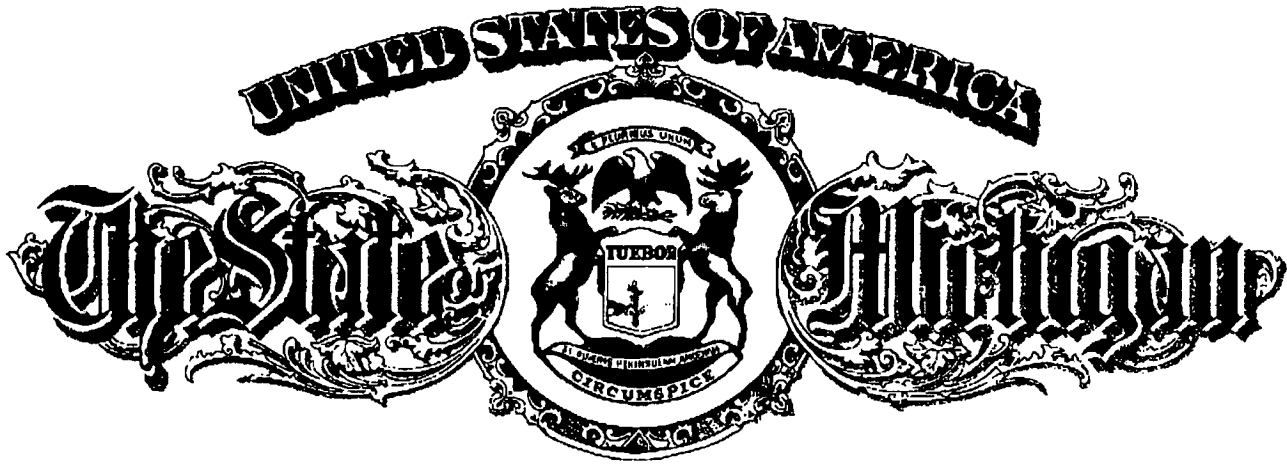
Brivar Construction Company

7258 Kensington Road

Brighton, MI 48116

Type	Record	Property Address	Amount
Permit	PB180068	4930 HOLTZ DR	[REDACTED]

<b>Total</b>	[REDACTED]
Cash	
Ck Num: 4001106	Check \$ 135,000.00
Credit	
Transferred	
<b>Tendered \$</b>	[REDACTED]
<b>Change</b>	
<b>To Overpayment</b>	[REDACTED]



**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.*

*[Signature]* 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



WORK INSTRUCTION			
Name:	<b>Downstream Vendor Selection Program</b>		
Document No:	<b>WORK.01.08.01</b>	Revision No:	<b>13</b>
Owner:	Director, Quality & Process Excellence		
Create date:	7/20/2016	Page:	<b>1 of 5</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

1. Potential vendors shall complete and return [FORM.01.08.01-Downstream Vendor Questionnaire](#) (or provide equivalent documentation).
  - a. 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 for all non-R2 certified DSV's who will handle phones in the Call2Recycle program.
  - b. 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 for all non-R2 certified DSV's who will handle phones in the Call2Recycle program.
2. 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.
3. 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

WORK INSTRUCTION			
Name:	<b>Downstream Vendor Selection Program</b>		
Document No:	<b>WORK.01.08.01</b>	Revision No:	<b>13</b>
Owner:	Director, Quality & Process Excellence		
Create date:	7/20/2016	Page:	<b>2 of 5</b>



Audit Checklist. Determination of whether an on-site audit should be conducted is based on vendor history, desk audit findings and/or customer requirements. Onsite audits are conducted on [FORM.01.08.03-Vendor Onsite Audit Template](#)

4. 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.
5. 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.
6. 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

1. 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.
2. Annually during On-Going Due Diligence, a signed R2 Addendum for all non-R2 certified DSV's who handle phones in the Call2Recycle program should be verified and reviewed.
  - a) This will be saved on SharePoint (Operations -> Downstream Vendors-> Completed Audits-> Desktop Audits) and may be on either form: [FORM.01.08.01-Downstream Vendor Questionnaire](#) or [FORM.01.08.02-Downstream Vendor R2 Addendum](#)
  - b) Review should be documented on the [FORM.01.08.02 R2 Desk Audit Checklist](#)

#### Site Audits

1. As practical and available, Call2Recycle will conduct on-site audits of sorters and processors.
2. Alternatively, Call2Recycle may substitute staff audits with external audits. These audits may be conducted by partners such as CHWMEG or Greeneye Partners.
3. Effective upon the lifting of COVID-19 restrictions, Call2Recycle will begin an on-site audit process such that all sorters and processors are audited every three years.
4. Call2Recycle audits will be conducted by Operations staff. First time auditors will be guided by staff with prior audit experience.
5. External audits will be reviewed by Operations staff. First time reviewers will be guided by staff with prior audit experience.

WORK INSTRUCTION			
Name:	<b>Downstream Vendor Selection Program</b>		
Document No:	<b>WORK.01.08.01</b>	Revision No:	<b>13</b>
Owner:	Director, Quality & Process Excellence		
Create date:	7/20/2016	Page:	<b>3 of 5</b>



6. Factors that may be considered from internal and external audits include:
  - a. Compliance issues or non-conformances
  - b. Process flow (actual vs documented)
  - c. Conditions that may result in the loss of control, spill or release of focus material, hazardous waste, universal waste or other materials of concern.
  - d. Applicable contractual obligations (Call2Recycle audits only - ie sorter backlog and days on dock)
  - e. Conditions that may expose Call2Recycle, our collection sites, other DSV's, stewards or members to risk, including financial, reputational, environmental or safety.
7. Audits shall be tracked on **PUB.01.08.07-Vendor On-Site Audit Tracker**

#### Due Diligence for R2 Certified Downstream Vendors


1. Downstream vendors who are R2 certified must still go through Initial Due Diligence and On-Going Due Diligence.
2. 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)."*
3. 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:"*
    - (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.

WORK INSTRUCTION			
Name:	<b>Downstream Vendor Selection Program</b>		
Document No:	<b>WORK.01.08.01</b>	Revision No:	<b>13</b>
Owner:	Director, Quality & Process Excellence		
Create date:	7/20/2016	Page:	<b>4 of 5</b>



**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 FreighQuote) 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.01.08.04- Transportation Carrier SAFER Check](#)
4. Complete and sign FORM.01.08.05–Transporter Qualification

**Non-Standard Transporter Qualification:**

Many of the documents and qualifications used for road transportation carriers are not appropriate for or relevant to VOCC (vessel operating common carriers) or freight forwarders. As an alternate to the process above, alternate means of qualification may be employed for freight forwarders or VOCC's. Conformance with Provision 12 of the R2:2013 standard must still be demonstrated. An example of an alternate qualification is *PUB.01.08.10 - Non-Standard Transporter Qualification-Hapag Lloyd/Noatum*.

**Procurement**


The process for to controlling procurement of products and services in order to ensure their conformity to its EHS management system is described in WORK.01.08.06 Control of External Providers Procedure

**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

WORK INSTRUCTION			
Name:	<b>Downstream Vendor Selection Program</b>		
Document No:	<b>WORK.01.08.01</b>	Revision No:	<b>13</b>
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<a href="#">FORM.01.08.03</a>	Vendor Onsite Audit Template
<a href="#">PUB.01.08.05</a>	Transportation Carrier SAFER Check
<a href="#">WORK.01.08.06</a>	Control of External Providers Procedure
FORM.01.08.05	Transporter Qualification

## 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
10	2/26/2020	Clarified requirements for R2 Addendum	E Frederickson
11	08/11/2020	Added On-Site Audit requirements (including CHWMEG)	E Frederickson
12	8/16/20	Added section on procurement	E Frederickson
13	9/11/2020	Added requirement for FORM.01.08.05-Transporter Qualification	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:

<p><b>MATERIALS PROCESSED for Call2Recycle:</b>          Check all that are applicable;</p> <p><input type="checkbox"/> Batteries</p> <p><input type="checkbox"/> Cell Phones</p> <p><input type="checkbox"/> Other: _____</p> <p><input type="checkbox"/> Other: _____</p>	<p><b>Monthly Capacity: (In Pounds):</b></p>
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<p><b>PROCESS INFORMATION</b></p> <p>Please describe the processes used to handle <b>Call2Recycle's</b> materials:</p>          
--





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"/> Yes - please attach explanation	<input type="checkbox"/> No

<b>OCCUPATIONAL HEALTH &amp; SAFETY</b>		
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"/> Yes - 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

<b>HAZARDOUS and UNIVERSAL WASTE PROCESSING, HANDLING &amp; STORAGE</b>		
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

<b>Form Completed By: (Name and Title)</b>	<b>Signature:</b>	<b>Date:</b>
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## R2 Addendum

CALL2RECYCLE is seeking certification to R2:2013, Responsible Recycling Practices for Electronic Recyclers. The R2 standard identifies Focus Materials (PCBs, Mercury, CRTs and CRT glass, Batteries and Circuit Boards) as problematic and requiring additional controls.

Your company has been identified by CALL2RECYCLE as handling/processing one or more of CALL2RECYCLE's focus materials. CALL2RECYCLE will be working with our downstream vendors to pursue the following downstream vendor requirements as stated in the R2 standard (see attached R2 standard):

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

For shipments of removed FMs, and shipments of equipment and components containing FMs, CALL2RECYCLE shall select downstream vendors that possess and conform to:

1. CALL2RECYCLE's FM Management Plan, and
2. A documented system to manage environmental, health, safety and data security risks and legal requirements. The management system shall include at a minimum the components of R2 Provision 3, and
3. Compliance with all applicable environmental, health, safety and data security legal requirements and maintain a list of its environmental permits and copies of each, and
4. Assurance that any additional downstream vendors in the Recycling Chain of FMs from CALL2RECYCLE conforms to these subsections (1) – (7) and Section 5(f), or allow CALL2RECYCLE to confirm this information with each of its relevant downstream vendors, thereby establishing that each vendor in the Recycling Chain conforms to these subsections (1) – (7), and
5. Provision 6 (Reusable equipment, if the downstream vendor is sending any of CALL2RECYCLE's focus material for Reuse (not recycling or recovery), and
6. Provision 7 (Tracking Throughput) for documenting the flow of all FMs down the Recycling Chain, and
7. Provision 8 (Data Destruction) for the data security and data sanitization of all data-bearing-devices as appropriate for the FM received and work performed, and
8. Conform to Provision 10 (Security), ensuring security of the equipment down the Recycling Chain.

*CALL2RECYCLE shall confirm, at least annually and document through audits or other similarly effective means that each downstream vendor in the Recycling Chain to continues to conform to these requirements for as long as it receives FMs directly or indirectly from CALL2RECYCLE.*

In order to comply with R2 requirements, CALL2RECYCLE is requesting all downstream vendors sign below stating that;

1. They agree to abide by the requirements listed above;
2. They have reviewed the attached CALL2RECYCLE's Focus Material Management Plan;
3. They have reviewed the attached R2:2013 standard

\_\_\_\_\_  
Management Representative – Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Management Representative – 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 (New vendor onboarding only)**

- 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 who process phones): \_\_\_\_

**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(s): \_\_\_\_\_ (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.

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

- a. Evidence Provided:

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**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)

\_\_\_\_\_

# *Charge Up Safety!*

## Call2Recycle<sup>®</sup> Collection Site Safety Training



# What you will learn

In this lesson, you will learn what you can do to safely prepare batteries and cellphones for shipment. A short quiz follows the lesson. Passing the quiz enables your site to continue in the Call2Recycle battery recycling program.

This lesson includes:

- What batteries are acceptable
- How to safely collect and handle batteries
- What to do with damaged batteries
- How to safely store used batteries
- What containers are acceptable for shipping batteries
- How to prepare a collection box for shipment
- How to avoid potential safety incidents during transport



## Call2Recycle® Collection Site Safety Training **Part 1: Battery preparation and handling**



**Batteries power the modern world, whether it's your cellphone, tablet, power tool or digital camera.**



**When batteries lose their charge or ability to recharge,  
it's time to recycle them.**

## What happens to a recycled battery?

The recycled materials that come from batteries are used to manufacture new products such as:



**NEW  
BATTERIES**



**SUN SCREEN**



**STAINLESS  
STEEL POTS  
& PANS**



**GOLF CLUBS**



**SILVERWARE**

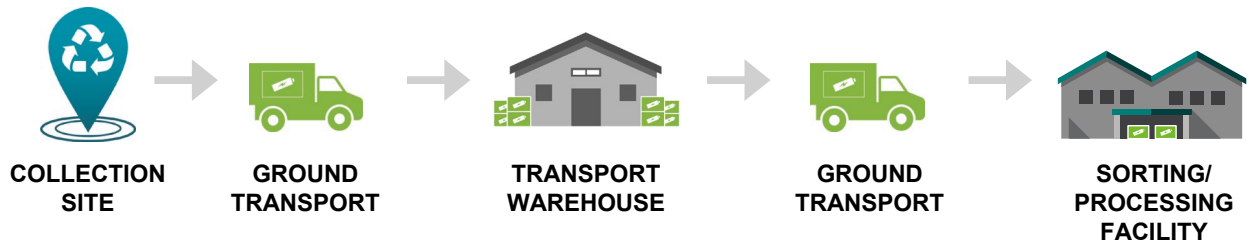


**ASPHALTS  
FOR ROADS**

Plus, the batteries are kept out of landfills!

## Where does a used battery go?

The recycling process begins when used batteries are dropped off at a Call2Recycle collection site. From there, the battery is shipped using ground transportation to a sorting facility.



**Safety is important during every step of the journey.**

## Why you should care about battery safety

1. As more products using batteries (e.g. toys, tools, electronics) are sold, more batteries are **flooding the market**.
2. Battery chemistries can be **hard to identify** making it difficult to know which are hazardous and require special preparation for shipping.
3. Proper handling of batteries at their end of life is critical, especially as the **power** of batteries increases and their size shrinks.
4. Counterfeit batteries, which can be more likely to cause safety incidents, are increasingly making their way into the market.

## Call2Recycle accepts rechargeable batteries each weighing less than 11lbs (5kgs)

### Accepted Rechargeable Batteries



Nickel Cadmium (Ni-Cd)



Lithium Ion (Li-Ion)



Nickel Metal Hydride (Ni-MH)



Small Sealed Lead Acid (SSLA/Pb)



Nickel Zinc (Ni-Zn)

## Call2Recycle accepts primary batteries each weighing less than 11lbs (5kgs)\*

### Accepted Primary (Single-Use) Batteries



**Alkaline: AA, AAA, 6V,  
9V, C, D, button cells**



**Lithium Primary**

*\* In Vermont, primary batteries are collected at no-cost to consumers and program is offered at no-cost to collection sites. In other States, select collection sites may have opted into Call2Recycle's fee-based program for recycling primary batteries; check to see if your collection site is one of them.*



## **Call2Recycle will NOT accept these batteries:**

- Batteries weighing more than 11lbs (5kgs)
- Wet cell batteries
- Car batteries
- Lithium ion rechargeable batteries over 300 watt hours
- Lithium primary batteries with over 25 grams of lithium content

## Battery terminals must be protected

Here's why.



Many rechargeable batteries hold a residual charge even when they appear dead. When this battery comes into contact with other batteries or metal, a short circuit may occur, resulting in a fire.

Unprotected battery terminals are dangerous.

**Sparks can cause smoke, fires and explosions resulting in property damage or physical injury.**



## You must prepare batteries for shipment according to U.S. DOT guidelines\*

Bagging is the quickest and easiest way to protect battery terminals.

- Boxes include self-sealing clear plastic bags
- Drop one battery in the bag
- Peel away the adhesive protective film
- Fold the flap over making contact between the adhesive strip and the bag



*Gloves are recommended in high-volume environments.*

\*U.S. DOT has specific terminal protection requirements that minimally must be adhered to when shipping select batteries (for a complete list visit [Call2Recycle.org/safety](https://www.call2recycle.org/safety)). When in doubt of battery type, Call2Recycle recommends bagging or taping.

## When you run out of Call2Recycle bags, you can use these:



**BEST OPTION**  
Clear bags provided by  
Call2Recycle



Clear Ziploc® bags



Clear produce bags  
(should be tied to seal)



Clear newspaper bags  
(should be tied to seal)

## When clear plastic bags are not available, you can tape each battery.

### AA, AAA, C & D batteries

Tape the positive (+) terminal (the one with the bump).



### Other battery types

Tape the charging terminals.



## You can use these types of tape (clear preferred):



**Clear packing tape**



**Duct tape**



**Non-conductive  
electrical tape**

*Do NOT cover chemistry  
type on battery label.*



## For button batteries, you can make a 'ravioli'

1. Lay down a piece of CLEAR packing tape, sticky side up.
2. Place the button batteries on the tape *with space between* each battery.
3. Cover with a second layer of CLEAR tape.

**CLEAR packing tape** helps the sorter identify the battery type quickly.



## Do NOT use any of the following to protect battery terminals



Colored bags



Grocery bags



Paper bags



Paraffin or other dipping products



Painter's tape



Masking tape



Scotch tape

## Lithium-based batteries are the most popular battery today

They are found in cellphones and other electronics.

They come in many shapes and sizes, are hard to identify and can be dangerous if not properly handled.



Always bag or tape **each one!**



## Watch for Lithium Ion or Lithium batteries that show signs of damage such as smoking, leaking or overheating.



Do NOT place damaged Lithium Ion or Lithium primary batteries in a collection box. Immediately put them in an absorbent, non-flammable material (sand or cat litter) in a cool, dry area.

The U.S. DOT requires special handling for defective, damaged or recalled (DDR) lithium ion and lithium primary batteries. Contact Call2Recycle Customer Service at 877.723.1297 for options.

## What you need to know about cellphones

### Call2Recycle accepts:

- All cellphones, with or without batteries.
- All cellphones should be bagged before shipment.



*We do NOT accept cellphone accessories, such as chargers.*

Cellphones are refurbished and resold, depending on the condition. We recycle phones that cannot be refurbished. The proceeds help fund the cellphone collection program and public education.

## Call2Recycle® Collection Site Safety Training *Part 2: Box preparation and handling*



## What you need to know about collection boxes

### Call2Recycle accepts batteries returned in:

- Call2Recycle boxes
- Those pre-approved by Call2Recycle

Boxes must be stored in a cool, dry place and should be regularly monitored.

Write the date you began collecting batteries in the Accumulation area on the box.





## How you prepare a box for shipping

- 1 Visually inspect and remove all non-battery items except cellphones.



## Check that there are only batteries or cellphones in the box!

**No paper! No plastic! No metal!**



No paper



No extra items,  
such as light  
bulbs or other  
recyclables



No metals,  
such as screws  
or paper clips



No extra  
Call2Recycle  
plastic bags

## Remove and examine all batteries from containers and bags



*For the complete list of batteries with terminals that must be protected, please consult the Call2Recycle web site ([www.Call2Recycle.org/safety](http://www.Call2Recycle.org/safety)).*

## Prepare the box

- 2** Do **NOT** add any padding (paper, wood, pellets, etc.)



- 3** Seal the box
- Release the header tabs & side flaps
  - Remove backing from inside adhesive strips
  - Fold down while inserting side flaps
  - Cross tape the outside in a tic-tac-toe design (shown below).

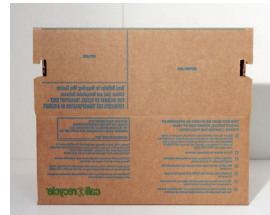


## Prepare the box for shipment

- 4** Complete the return shipper's label.



- 5**
- Do **NOT** add warning labels.
  - Do **NOT** cover the text on the back of the box. The U.S. DOT requires the text to be visible.



## An example of a properly prepared box for shipment?



Batteries are properly bagged.  
The positive terminals are protected; bagging is consistent.

# 7 things for you to remember

1. Bag or tape **batteries** according to U.S. DOT requirements. When in doubt, bag or tape!
2. Collection sites that ship batteries that are not properly prepared may face program suspension/termination.
3. Batteries considered damaged, defective or recalled must be shipped in separate U.S. DOT-approved packaging. Do not include in a regular Call2Recycle box.
4. Call2Recycle accepts Call2Recycle boxes or those pre-approved by Call2Recycle.
5. Boxes should contain **only** batteries and cellphones, nothing else.
6. Check that the preprinted instructions and text on the back of the box are visible prior to shipment.
7. Boxes should be shipped when they are full (up to 66lbs./30kgs) or within one year of the first battery being collected.



## ***Charge Up Safety!***

Thank you for your commitment to protecting the environment through safe battery recycling.





**For additional safety resources, including training materials  
and videos, please visit [www.call2recycle.org/safety](http://www.call2recycle.org/safety)**

July 23, 2020



U.S. Department  
of Transportation

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

Pipeline and Hazardous  
Materials Safety Administration

DOT-SP 14849  
(SIXTH REVISION)

**EXPIRATION DATE: 2024-06-30**

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: Call2Recycle, Inc.  
Atlanta, GA
2. PURPOSE AND LIMITATIONS:
  - a. This special permit authorizes the manufacture, mark, 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.
  - c. In accordance with 49 CFR 107.107(a), party status may not be granted to a manufacturing permit. These packagings may be used in accordance with 49 CFR 173.22a.
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

July 23, 2020

§ 173.185(c) and § 172.102(c)(1), Special Provision 130; § 172.102(c)(1), Special Provision 130(d) in that batteries utilizing different chemistries (i.e., those battery chemistries specifically covered by another entry in the § 172.101 Hazardous Materials Table) as well as dry batteries may be combined with used or spent batteries in the same package; § 172.303(a) in that the package may be marked with UN ID numbers specified in § 173.185(c)(3)(i) on the battery mark if the package does not contain those hazardous materials; § 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; § 173.185(c)(1)(iv) in that these lithium batteries may be transported aboard cargo vessel; and § 173.185(d) in that transportation by rail is authorized, as provided herein.

5. BASIS: This special permit is based on the applications of Call2Recycle, Inc. dated December 2, 2019, submitted in accordance with § 107.109 and dated April 2, 2020, submitted in accordance with § 107.105 and the public proceeding thereon.
6. HAZARDOUS MATERIALS (49 CFR § 172.101):

Hazardous Material 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

Hazardous Material Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Lithium metal batteries contained in equipment including lithium alloy batteries	9	UN3091	N/A
Lithium metal batteries packed with equipment including lithium alloy batteries	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:

(1) Prescribed packaging is a non-DOT specification fiberboard box lined with a fire-resistant liner the performance of which in the thermal events is demonstrated to be compliant in containing thermal runaway by tests as described in the test report submitted in the Call2Recycle, Inc.'s April 2, 2020 application, which is on file with the Office of Hazardous Materials Safety Approvals and Permits Division (OHMSAPD).

(2) The fiberboard box with the fire-resistant liner must be capable of withstanding a 1.2 meter drop test in any orientation:

- (i) Without damage to cells or batteries contained in the package;
- (ii) Without shifting of the contents that would allow short circuiting; and
- (iii) Without release of package contents.



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b. MARKING: Each package covered under terms of this special permit must be durably and legibly marked and displayed on a background of contrasting color with the following:

(1) "DOT-SP 14849".

(2) "Used Batteries for Recycling or Disposal: May Contain Lithium Batteries and Non-spillable Batteries. FOR GROUND OR CARGO VESSEL TRANSPORT ONLY - FORBIDDEN FOR TRANSPORTATION BY AIRCRAFT" at least 6 mm (0.25 inch) in height.

(3) For packagings manufactured after October 31, 2020, the lithium battery mark in § 173.185(c)(3)(i).

(4) Instructions for complying with the requirements of this special permit.

(5) An emergency response telephone number accessible 24 hours per day in case of damage to the packaging or contents.

8. OPERATIONAL CONTROLS:

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

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

c. The lithium content of each lithium metal battery transported in a packaging is limited to 25 g, and the energy content of each lithium ion battery based on the original Wh rating in a packaging is limited to 300 Wh.

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

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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. Non-spillable batteries are limited to 11 kg (25 pounds) or less gross weight each.

j. Training on the requirements of this special permit and the filling and preparation of the package must be provided to users of the packagings.

k. 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).

l. 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).

m. 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 reoffer it for transportation provided no modification or



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change is made to the package and 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 vehicle, rail, or cargo vessel carrier must notify the operator of the motor vehicle, rail car, or cargo vessel of the presence of hazardous materials and that in the event of damage, the emergency response number, and emergency procedures applicable to the motor vehicle, rail, or cargo vessel 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 grantee's 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 OHMSAPD for a specific manufacturing facility.

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, rail freight, and cargo vessel. Cargo vessel is authorized only to and from Alaska, Hawaii, Guam, Puerto Rico, and the Virgin Islands, and to and from areas that cannot be accessed by motor vehicle or rail freight.
11. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each cargo vessel used to transport packages covered by this special permit.

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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.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this special permit must receive training on the requirements and conditions of this special permit provided by the grantee.

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.

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

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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.:



for William Schoonover  
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: Steve H



October 26, 2020



U.S. Department  
of Transportation

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

Pipeline and Hazardous  
Materials Safety Administration

DOT-SP 20549  
(FIFTH REVISION)

**EXPIRATION DATE: 2024-09-30**

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Cellblock FCS, LLC  
Standish, ME
2. PURPOSE AND LIMITATIONS:
  - a. This special permit authorizes the manufacture, mark, sale, and use of UN specification packagings for the transportation in commerce of batteries including damaged, defective, or recalled lithium ion cells and batteries and lithium metal cells and batteries and those contained in or packed with equipment. 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.
  - c. In accordance with 49 CFR 107.107(a), party status may not be granted to a manufacturing permit. These packagings may be used in accordance with 49 CFR 173.22a.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.

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4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR Subparts C through H of Part 172 in that shipping papers, marking, labeling, placarding, emergency response information, and training are not required for batteries and cells already excepted by § 173.185(c) and § 172.102(c)(1) Special Provision 130; § 172.102(c)(1) Special Provisions 130(d) in that batteries utilizing different chemistries (i.e., those battery and cell chemistries specifically covered by another entry in the § 172.101 Hazardous Materials Table) as well as dry batteries may be combined with used or spent batteries and cells in the same package; § 173.159a(c)(2) in that marking the non-spillable 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; and § 173.185(f) in that more than one lithium cell or battery per package, alternative packaging, and alternative marking are authorized, as specified herein.
5. BASIS: This special permit is based on the application of Cellblock FCS, LLC dated October 20, 2020 and submitted in accordance with § 107.109.
6. HAZARDOUS MATERIALS (49 CFR 172.101):

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

Hazardous Material Description			
Proper Shipping Name	Hazard Class/Division	Identification Number	Packing Group
Batteries, wet, nonspillable	8	UN2800	N/A
Batteries, dry, sealed, n.o.s.	See Special Provision 130		

7. SAFETY CONTROL MEASURES:a. OPERATIONAL CONTROLS:

(1) Damaged, defective, recalled lithium cells and batteries, and lithium cells or batteries, contained in or, packed with equipment must have originally met the requirements for testing in accordance with the edition of the UN Manual of Tests and Criteria authorized at the time of testing, prior to becoming damaged, defective, or recalled.

(2) Transportation by cargo vessel is only permitted when motor vehicle shipments are not possible.

(3) For transportation by cargo vessel, only lithium cells or batteries (including those contained in or packed with equipment) with a lithium content not exceeding 1 g for a lithium metal cell or 2 g for a lithium metal battery and with a Watt-hour rating not exceeding 20 Wh for a lithium ion cell or 100 Wh for a lithium ion battery are not subject to 49 CFR Subparts C through H of Part 172, except as specified herein.

(4) For transportation by highway or rail, only lithium cells or batteries (including those contained in or packed with equipment with a lithium content not exceeding 5 g for a lithium metal cell or 25 g for a lithium metal battery and with Watt-hour rating not exceeding 60 Wh for a lithium ion cell or 300 Wh for a lithium ion battery are not subject to 49 CFR Subparts C through H of Part 172, except as specified herein.



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(5) Cells or batteries (including those packed with or contained in equipment) that do not conform to the requirements in paragraphs 7.a.(3) or 7.a.(4) are subject to 49 CFR Subparts C through H of Part 172.

(6) Lithium ion and metal cells and batteries, non-spillable batteries and dry cell batteries (non-spillable and dry cell batteries with a marked rating over nine (9) volts) must be protected against short circuits. Some suitable methods of protecting 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.

(7) Cells or batteries contained in or packed with equipment must be protected against short circuits (unless the equipment affords that protection) and unintentional activation.

(8) Non-spillable batteries are limited to 11 kg (25 pounds) or less gross weight each.

b. PACKAGING:

(1) INNER PACKAGING:

(i) Damaged, defective, or recalled cells or batteries, including those contained in or packed with equipment, must be individually packed in a non-metallic packaging that completely encloses each cell, battery or piece of equipment and must be surrounded by cushioning material that is non-combustible, non-conductive, and absorbent;

(ii) For damaged, defective, and recalled cells or batteries, including those contained in or packed with equipment, inner packaging is not required provided paragraphs 7.b.(2)(i)(B), (C), and (D) are followed; or

(iii) Alternatively, if the outer packaging is prepared as provided in the packing instructions (PIs) dated April 24, 2019 for granular and May 24, 2019 for pillowed granular thermally insulating fire suppressant (term used hereafter



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in lieu of the registered trade mark) provided by CellBlock FCS, LLC, inner packaging specified in paragraph 7.b.(1)(i) is not required, and protection against short circuiting specified in paragraphs 7.a.(6), 7.a.(7), and 7.b.(1)(ii) is not required. The PIs are summarized in paragraph 7.b.(2) below and are on file with the Office of Hazardous Materials Safety Approvals and Permits Division.

(2) OUTER PACKAGING:

(i) If the packages are prepared in accordance with paragraphs 7.b.(1)(i) or 7.b.(1)(ii), the outer packaging must meet the following:

(A) The completed inner package must be surrounded by cushioning material that is non-combustible, non-conductive, and absorbent and placed in a UN specification steel, aluminum, or other metal box or drum that is capable of meeting a 1.2 meter drop test.

(B) Each outer packaging must be completely clad with thermally insulating fire suppressants, as described in CellBlock FCS, LLC's application dated September 20, 2017 and on file with the Office of Hazardous Materials Safety Approvals and Permits Division, in a sufficient quantity and manner that will suppress lithium battery fires, heat, smoke and absorbs the smoke, gases and flammable vapors and electrolytes during a thermal runaway incident.

(C) The outer packaging must be filled with thermally insulating fire suppressants, wherever possible, as dunnage to protect the cells and batteries and retard rapid heat transfer.

(D) Not more than 5 kg of damaged lithium cells and batteries may be contained in a single package.

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(ii) If the packages are prepared in accordance with paragraph 7.b.(1)(iii), the outer packaging must meet the following

(A) The outer packaging must be a UN specification metal, plastic, or fiberboard box or drum that meets the Packaging Group I performance level.

(B) Additionally, the outer packaging must be filled with the thermally insulating fire suppressant where the suppressant completely surrounds each cell or battery or those contained in equipment by at least 2 inches of suppressant. Alternatively, the cells or batteries or equipment may be placed within a thermally insulating fire suppression pillow affording a sufficient quantity of fire suppressant material. The thermally insulating fire suppressant, when utilized without an inner package, must be in a sufficient quantity to:

(1) Absorb all of the potential release of electrolyte.

(2) Suppress lithium cell/battery fires, heat, and smoke.

(3) Absorb the smoke, gases, flammable vapors, and electrolytes during a thermal runaway incident.

(4) Protect from the effects of shock and vibration and prevent movement of the cells, batteries, and/or the equipment.

(iii) The gross weight of damaged, defective or recalled cells or batteries in a 55-gallon, 30-gallon, or 5-gallon metal or plastic packaging may not exceed 60 kg (132 pounds), 30 kg (60 pounds), or 5 kg (11 pounds), respectively, and 2 kg (4.4 pounds) for thermally insulated pillowed 4G boxes.

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(iv) The outer packaging must be leak-proof to prevent the potential release of electrolyte and a venting device must be used for leaking cells or batteries.

(3) Each package must meet the requirements in §§ 173.24 and 173.24a.

c. MARKING:

(1) Each package covered under the terms of this special permit must be durably and legibly marked and displayed on a background of contrasting color with the following:

(i) "DOT-SP 20549".

(ii) For packages conforming to the requirements in paragraph 7.a.(3), the words: "Batteries for Recycling: May Contain Damaged Lithium Batteries - FOR GROUND OR CARGO VESSEL TRANSPORT ONLY - FORBIDDEN FOR TRANSPORTATION BY AIRCRAFT" in letters at least 12 mm (0.5 inch) in height except that packages with a maximum gross mass of 30 kg (66 pounds) or less may be marked with characters at least 6 mm (0.25 inches) high, and packages with a maximum net mass of 5 kg (11 pounds) or less may be marked in a size appropriate for the size of the package.

(iii) For packages conforming to the requirements in paragraph 7.a.(4), the words: "Batteries for Recycling: May Contain Damaged Lithium Batteries - FOR GROUND TRANSPORT ONLY - FORBIDDEN FOR TRANSPORTATION BY AIRCRAFT AND CARGO VESSEL" in letters at least 12 mm (0.5 inch) in height except that packages with a maximum gross mass of 30 kg (66 pounds) or less may be marked with characters at least 6 mm (0.25 inches) high, and packages with a maximum net mass of 5 kg (11 pounds) or less may be marked in a size appropriate for the size of the package.

(iv) The handling marking in § 173.185(c)(3)(i) when the package conforms to the requirements in paragraph 7.a.(3) or 7.a.(4).



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(v) Marked and labeled in accordance with the requirements in Subparts D and E of Part 172 when the package does not conform to the requirements in paragraphs 7.a.(3) or 7.a.(4) above or to § 173.185(c)(1)(vi).

(vi) An emergency response telephone number in case of damage to the packaging or contents.

(2) Additionally, each package may be marked with a QR code which when scanned provides a direct link to a specific URL where the most recent revision of the special permit can be viewed or downloaded. If the QR code is marked on the packaging, the URL must also be marked on the packaging.

(3) 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). All other applicable requirements in § 173.159a apply.

d. Detailed closure, packing, and shipping instructions must be provided to individuals preparing shipments under the terms of the special permit. Persons offering packages for transportation must comply with the closure, packing, and shipping instructions accompanying the packaging.

8. 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 reoffer it for transportation provided no modification or change is made to the package and it is offered for transportation in conformance with this special permit and the HMR.

c. A current copy of this special permit must be maintained at each facility where the package is offered or reoffered for transportation.

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d. 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 Safety Approvals and Permits Division for a specific manufacturing facility.

e. A current copy of this special permit must be maintained at each facility where the packaging is manufactured under this special permit. It must be made available to a DOT representative upon request.

f. When utilized as specified in this special permit, the completed package is not subject to 49 CFR Subparts C through H of Part 172 (i.e., shipping papers, marking, labeling, placarding, emergency response information, and training), except as specified herein.

g. Packages are subject to 49 CFR Subparts C through H of Part 172 (i.e., shipping papers, marking, labeling, placarding, emergency response information, and training), as applicable, when not conforming to:

(1) The lithium content or Watt-hour rating limitations in paragraphs 7.a.(3) or (4) above;

(2) § 173.185(c)(1)(vi); or

(3) § 173.159a(d).

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle, cargo vessel, and rail freight.

10. MODAL REQUIREMENTS:

a. A current copy of this special permit must be carried aboard each cargo vessel.

b. For motor vehicle shipments, a current copy of this special permit must be carried aboard each motor vehicle unless the package is marked in accordance with paragraph 7.c.(2).

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11. 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.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this special permit related to a package under paragraph 8.g. must receive training on the requirements and conditions of this special permit in addition to the training required by §§ 172.700 through 172.704.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this special permit related to packages that conform to the requirements in paragraph 8.f. must receive adequate instruction on the requirements and conditions of this special permit.

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.

12. 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.:



for William Schoonover  
Associate Administrator for Hazardous Materials Safety

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Pipeline and Hazardous Materials 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: SH/TG





# Scope of Work

## Independent Assessment Vermont Primary Battery Stewardship Program (codified in Act 139)

**Issued: September 29, 2020**

**Issued by:**

Call2Recycle, Inc.  
1000 Parkwood Circle, Suite 200  
Atlanta, GA 30339  
678-419-9990 | [call2recycle.org](http://call2recycle.org)

**Primary Contact:**

Carl E. Smith  
CEO & President  
[csmith@call2recycle.org](mailto:csmith@call2recycle.org)  
678-218-4586

## **VERMONT PRIMARY BATTERY STEWARDSHIP PROGRAM**

On January 1, 2016, Call2Recycle, Inc, a non-profit 501(c)(4) stewardship organization based in Atlanta, GA, with a regional program manager located in Vermont, began operating the nation's first primary (non-rechargeable) producer-funded battery stewardship program in Vermont.

Since inception, over 350,000 lbs. of Vermont's primary batteries have been recycled through the Call2Recycle® program, providing an environmentally-beneficial end-of-life solution.

## **LEGISLATION AND PLAN**

On May 22, 2014, Vermont's Governor Shumlin signed ACT No.139 into Vermont law, creating the nation's first primary battery stewardship bill: [ACT 139 PDF](#)

On behalf of 23 obligated primary battery producers, Call2Recycle's Stewardship Plan (the "Plan") was submitted June 1, 2015 and Call2Recycle was appointed as the approved stewardship organization to administer the Program, beginning January 1, 2016. The accepted Plan has been updated several times since inception to reflect program modifications, and the current Plan is available at: [Call2Recycle Current Stewardship Plan](#). Call2Recycle recently submitted its 5-year renewal plan (2021-2025) and is currently awaiting preliminary feedback from Vermont Agency of Natural Resources.

When the Program launched on January 1, 2016, Vermont consumers were able to recycle their primary batteries at no cost through numerous public-facing collection facilities across the state, including retailers (Lowe's, The Home Depot, Staples, etc.) and waste facilities (Chittenden Solid Waste District, etc.). Private businesses and manufacturers also could collect and recycle their primary batteries at no-cost. Five years later, Vermont remains the only state with a legislated, producer-funded primary battery stewardship program.

Call2Recycle receives operating funds for the Program directly from stewards, those companies that meet the definition of "manufacturer" in the legislation.

## **FIVE YEAR AUDIT REQUIREMENT**

ACT No.139 requires an independent third-party Program "audit" after five years. Based on discussions with Vermont Department of Environmental Conservation (VT DEC), Agency of Natural Resources (ANR), spring 2020, this should be performed as a program 'assessment' for efficacy and cost efficiency versus a traditional "audit" in the legal/financial sense. Below is the legislative language detailing the requirements:

*ACT No. 139. An act relating to establishing a product stewardship program for primary batteries.*

**CHAPTER 168. PRODUCT STEWARDSHIP FOR PRIMARY BATTERIES AND RECHARGEABLE BATTERIES**

**§ 7585. ANNUAL REPORT; PLAN AUDIT**

*(Page 14)(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.*

## SCOPE OF WORK

Call2Recycle is seeking an experienced, technically-qualified third-party ('auditor') to administer the five-year assessment of the Program, including the following:

### AUDIT OBJECTIVES AND SCOPE OF SERVICES

Collaborating with VT DEC, ANR, the following audit ('assessment') outline was reviewed and approved in June 2020.

- A. **Third Party Analysis:** Call2Recycle will hire a third party to analyze the VT primary battery stewardship program. The purpose of hiring a third party auditor is to obtain an objective review of the effectiveness of the Vermont Primary Battery Stewardship Program, both for effective collection and recycling services to the public and collection sites, effective outreach, effective meeting of program goals, effectiveness of costs of the program, and comparison to similar programs. This will not be a "financial auditor" in the traditional sense, but rather an environmental auditor/consultant to assess the overall program effectiveness.
- B. **Cost and Collection Effectiveness:** The auditor will analyze the cost and collection effectiveness and offer recommendations on how to better meet the collection goals of the Vermont program that are outlined in the Primary Battery Stewardship Program Plan. In addition, the auditor will offer a comparison of Vermont's program with other similar battery collection & recycling programs.
- Program Comparison: Given that Vermont is the only state with a primary battery stewardship program, it is not possible to compare it with another jurisdiction in the United States. The auditor will instead compare it to Canadian battery programs. Canada's provincial programs, however, are dissimilar, as they are based on Environmental Handling Fees collected at point-of-sale, landfill bans, lack of "carve-outs" for batteries in packaging/products, an "all-battery" program as opposed to just primary batteries, among other discrepancies. However, these Canadian programs serve as good benchmarks overall.
  - Cost Effectiveness: Using Call2Recycle's annual financial audits and calculation tables for Vermont's financial allocations, the auditor will assess the cost effectiveness of the Vermont program in comparison to Canada's programs.
  - Collection Effectiveness: The auditor will analyze the following for Vermont and the jurisdictions used in comparison.
    - Population
    - Number of Collection Sites
    - Convenience
    - Total Collections
    - Collection Goal
    - Collections per Capita
    - Collections Rate vs Batteries Sold
    - Cost per Battery Collected
  - Similarity: The auditor will develop criteria on the similarity/dissimilarity of jurisdictions compared:

- Program Effective Date
- Generators Served/Limits – example, households, businesses, etc.
- Producer Responsibility Organization – example, Call2Recycle USA, Call2Recycle Canada
- Annual Reports
- Disposal Bans – Business/Household
- Financial Mechanisms

C. **Collection Site Interviews:** The auditor will evaluate the Call2Recycle collections network in Vermont, including the following:

- Randomly select collection sites from Call2Recycle’s master list, including:
  - Solid waste management districts.
  - Local government collection sites.
  - Chain retail sites.
  - Independent retail sites.
- Conduct phone interviews of collection sites to determine the effectiveness of training, information, and support they receive from Call2Recycle for safe collection, storage, management, shipping of batteries from consumers and effectiveness of program visibility to consumers at retail collection sites.
  - Interview staff who collect, package and ship batteries.
  - Analyze storage of batteries at collection locations.
  - Analyze signage, instructions, convenience, visibility for patrons. This can be achieved remotely by the auditor asking the collection site staff to describe the signage, instructions, and visibility of the program to customers.

D. **Downstream Processing:** The purpose of assessing downstream processing is to assure that batteries are safely collected, safely handled, and safely and appropriately recycled into new products and materials as this program is intended. Using Call2Recycle’s R2 audit package, and phone interviews with both *Retriev* and *Battery Solutions*, the auditor will ensure that Vermont primary batteries are transported and processed in accordance with all applicable laws and regulations, and R2’s strict criteria.

E. **Findings and Recommendations:** The auditor will summarize their conclusions on the effectiveness of the program, with specific recommendations on how to enhance primary battery collections in Vermont. Recommendations should specifically include actions such as improvements to outreach and awareness methods that would ensure Call2Recycle is able to better meet the annual collection goal as outlined in the VT Primary Battery Stewardship Program Plan.

F. **Exit Conference:** An exit conference with Call2Recycle staff engaged in managing the Program will be conducted by the auditor in charge no later than May 1, 2021. At the exit conference, findings and recommendations regarding program operation will be discussed, along with the proposed recommendations to the Secretary of Natural Resources. Call2Recycle’s Manager or a designee shall have the opportunity to respond, orally or in writing, to these findings prior to distribution to the Secretary. Any such written responses shall be included in the audit report, to be distributed to the Secretary no later than June 1, 2021.

## **ASSISTANCE AVAILABLE TO THE AUDITOR**

Call2Recycle will provide detailed summaries and access to documents related to the program, including the following:

- Call2Recycle Annual Financial Audits and Vermont Budget Calculation Tables
- Call2Recycle R2 Annual Audit Packages
- Recycling Processors – Retrieval, Battery Solutions – R2 Audit Packages
- Contracts with Professional Services
- Vermont Collection Site Names and Contact Information
- Annual Battery Collections Data (2016 – 2020)
- Call2Recycle's 5-Year Renewal Plan (2021-2025)
- Call2Recycle Canada's Provincial Financial and Collections Data
- Call2Recycle staff will assist auditor with questions and technical data.
- NEMA Audit – This battery audit outline is based upon a previous Vermont audit conducted in January 2017 by the National Electrical Manufacturer's Program (NEMA), for their legislated stewardship of mercury-containing lamps, which can be used as reference.

## **TIMELINE OF DELIVERABLES:**

- A. Years 2016 to 2019: data for this term is available, including Call2Recycle's annual financial audits and collection numbers. Ideally the scope of services for these years would be completed by December 31, 2020.
- B. Year 2020: 2020 financial audit for Call2Recycle will not be complete until March 2021. Therefore, completing the 2020 portion of the assessment should be completed by March 31, 2021.
- C. Final Report to Call2Recycle: Due April 20, 2021.
- D. Exit Conference: May 1, 2021
- E. Call2Recycle Response to Secretary: May 8, 2021
- F. Final Assessment Submitted to VT DEC: May 15, 2021

## **CALL2RECYCLE CONTACTS:**

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