

Small Format Batteries Collection Best Practices Working Session: Safe Collection, Storage, and Transport

May 14, 2024 U.S. Environmental Protection Agency (EPA)

Webinar Logistics



- To ask a question: Type your questions for presenters into the <u>Q&A feature</u> or click on the <u>Raise Hand</u> icon and we will unmute you to ask your question out loud.
- Technical difficulties? Message us in the <u>Chat</u> box or email <u>Kyra.Hall@erg.com</u>.



Welcome

Pat Tallarico, ERG Team

Agenda Overview

- 1. Opening remarks, logistics, and agenda review
- 2. Transportation
 - Kevin Leary, U.S. Department of Transportation
- 3. Retail collection
 - Todd Ellis, Call2Recycle
 - Robert Gass, Lowes
 - Micah Day, Stihl
- 4. State and local government perspectives
 - Megan Warfield, Washington State Department of Ecology
 - **Deb Ferraro,** City of Mesa Environmental & Sustainability Department
 - Billy Puk, Santa Clara County
- 5. End of Life/Next Life
 - Ryan Nolte, Recycled Materials Association (Formerly ISRI)



Collection Best Practices

Best practices will focus on:

- Identifying and increasing accessibility to battery collection locations
- Promoting consumer education
- Reducing hazards from improper disposal (fires)

Best practices will be:

- Technically and economically feasible
- Environmentally sound and safe for workers
- Beneficial to increasing the recovery of critical minerals



Scope of Batteries

Category	Small format consumer electric and portable batteries		Mid-format batteries	Large format vehicle and motive equipment batteries	Large format stationary storage batteries
Туре	Single use (Primary)	Rechargeable (Secondary)	Rechargeable	Rechargeable	Rechargeable
Use	Removable or embedded in electronics and electric devices, such as watches, hearing aids, cameras, key fobs, toys, portable radios, flashlights.	Removable or embedded in electronics and electric devices, such as phones, computers, appliances, small uninterruptable power supplies (UPS), power tools, power banks.	E-mobility including e- bikes, e-scooters. Outdoor power equipment. Portable power stations.	All scales of automotive starting and motive vehicle batteries. Materials handling equipment (forklift, crane, etc.) Recreational (golf carts, marine equipment, recreational vehicles, etc.)	Residential, including power wall, backup generators. Grid, including utility, solar, wind. Off grid and microgrid. Commercial, including building systems, data centers, server rooms, medical and hospital equipment, retail backup power.



Conversation Timeline

- A sequenced approach to conversations
- Small format labeling and collection conversations will proceed concurrently
- Leveraging existing, in-person industry meetings to test ideas and share updates



Transportation

Kevin Leary, U.S. Department of Transportation

Small Format Batteries: Safe Collection, Storage, and Transport

Kevin Leary, US DOT - PHMSA May 2024



U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration



Overview

- PHMSA in the Supply Chain
- Safety Concerns
- Transport Basics
- Resources





Pipeline and Hazardous Materials Safety Administration



U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration





PHMSA establishes regulations for the safe transportation of <u>hazardous materials in commerce</u> by all modes of transportation.

These regulations apply to persons who offers for transport or transport hazardous materials in commerce.

Lithium batteries **are** considered hazardous material in transportation.

Functions **not** subject to regulation by PHMSA include:

- Storage prior to or after transport
- Transport by an individual in private motor vehicle for noncommercial purposes
- Transportation of a hazardous material in a motor vehicle, aircraft, or vessel operated by a Federal, state, or local government employee solely for noncommercial Federal, state, or local government purposes



Pipeline and Hazardous Materials Safety Administration





Pipeline and Hazardous Materials Safety Administration PHMSA: Your Safety is Our Mission

13

Oversight Over the Transportation Process



Pipeline and Hazardous Materials Safety Administration

Safety Concerns





• The potential for venting of combustible and potentially toxic gases from lithium ion cells in thermal runaway

• The potential for propagation of thermal runaway between cells within a battery, cells or batteries in a package and between adjacent packages of batteries



U.S. Department of Transportation Riccellon and Hazardour Materia

Pipeline and Hazardous Materials Safety Administration

Safety Concerns



Batteries packaged for transport Lawrenceville, GA – December 2021



Lithium batteries described as "synthetic resins" Port of LA/Long beach – 2022



Lithium metal and lithium ion batteries destined for recycling – March 2023



Container of discarded lithium batteries listed as "computer parts" – August 2021



Pipeline and Hazardous Materials Safety Administration

Transport Basics Classification Packaging Hazard Communication



U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration





Classify the Hazard – Type of Lithium Batteries

- Lithium Metal
 - Metallic lithium or alloy
 - Size measured in grams
 - Generally not rechargeable (singleuse)
 - Typical configurations: coin cell, cylindrical, and rectangular
 - Examples: watches, thermometers

- Lithium Ion
 - Lithium compound
 - Size measured in Watt-hours (Wh)
 - Generally rechargeable
 - Typical configurations: cylindrical, rectangular, and pouch packs
 - Examples: laptops, tablets, cell phones, power tools



Pipeline and Hazardous Materials Safety Administration

Classify– UN ID Numbers

UN3480	• Lithium Ion Batteries
UN3481	 Lithium Ion Batteries Contained in/Packed with Equipment
UN3090	• Lithium Metal Batteries
UN3091	• Lithium Metal Batteries Contained in/Packed with Equipment



Pipeline and Hazardous Materials Safety Administration



Classify – Energy Capacity

 The energy capacity of the lithium battery is an important consideration – larger batteries and quantities are subject to increased regulation. Thresholds:

Lithium Ion
(Smaller Batteries)Lithium Metal
(Smaller Batteries)• ≤ 100 Wh
• ≤ 300 Wh ground only*• ≤ 2 g
• ≤ 25 g ground only*

* Additional hazard communication is required





Section 173.185 of the HMR

 <u>Section 173.185</u> in the HMR addresses requirements for lithium batteries, including the provisions for recycling lithium batteries:





U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration



Disposal/Recycling Exceptions



*For motor vehicle transportation ONLY <u>49 CFR § 173.185(d)</u>



U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration



Classify – UN 38.3 Design Tests

Test T.1 Altitude simulation.

Test T.2 Thermal test - conducted using rapid and extreme temperature changes

Test T.3 Vibration - simulates vibration during transport

Test T.4 Shock - assesses the robustness of cells and batteries against cumulative shocks

Test T.5 External short circuit

Test T.6 Impact/Crush - simulates mechanical abuse or crush that may result in an internal short circuit

Test T.7 Overcharge - evaluates the ability of a rechargeable battery or a single cell rechargeable battery to withstand an overcharge condition

Test T.8 Forced discharge - evaluates the ability of a primary or a rechargeable cell to withstand a forced discharge condition



Pipeline and Hazardous Materials Safety Administration



Packaging

- General Requirements
 - Prevent short circuits
 - Prevent damage caused by shifting
 - Prevent accidental activation
 - Prevent release of contents
 - Packaging requirements are performance-based

- Basic Configuration
 - Inner packaging
 - Cushioning material
 - Outer packaging

<u>49 CFR § 173.185(b)(1)–(3)/(c)</u>



U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration

Inner Packaging





Pipeline and Hazardous Materials Safety Administration

Outer Packaging





Pipeline and Hazardous Materials Safety Administration PHMSA: Your Safety is Our Mission



- 26 -

Hazard Communication – marks, labels, documents





Damaged, Defective, or Recalled ("DDR") Lithium Batteries

- Batteries to Look For:
 - Known defective
 - Leaked or vented
 - Sustained physical or mechanical damage
 - Cannot be diagnosed (i.e., cannot say for sure they are not damaged)

Source: UN Model Regulations 3.3.1, Special Provision 376

• Consider:

- Risk of acute hazards (e.g., gas, fire, electrolyte leaking)
- Known misuse of the battery
- Signs of physical damage
- Damage to safety features, components, or short circuit protection



U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration PHMSA: Your Safety is Our Mission

- 28 - 🗖





Understanding the risks of damaged, defective or recalled lithium batteries



Pipeline and Hazardous Materials Safety Administration PHMSA: Your Safety is Our Mission

29

Packaging DDR Batteries

- Batteries must be individually packaged as follows:
 - Non-metallic, inner packaging that completely encloses the battery
 - Inner packaging surrounded by non-combustible, nonconductive, and absorbent cushioning material
 - Single inner packaging must be placed in performanceoriented packaging at the Packing Group I performance level





How Does a Company Apply for a Special Permit?

Application procedures are in 49 CFR 107.105

- Routine requests = 120 day turnaround time
- Emergency requests = issued as quickly as possible

Email: specialpermits@dot.gov Phone: 202-366-4535

https://www.phmsa.dot.gov/approvalsand-permits/hazmat/hazardousmaterials-approvals-and-permitsoverview East Building, PHH-30 1200 New Jersey Avenue S.E. Washington, D.C. 20590

DOT-SP 20325

EXPIRATION DATE: 2017-03-31

(FOR RENEWAL, SEE 49 CFR 107.109)

- 1. <u>GRANTEE</u>: Samsung Electronics America, Inc. Ridgefield Park, NJ
- 2. <u>PURPOSE AND LIMITATIONS</u>:

a. This emergency special permit authorizes the use of alternative packagings for the transportation of recalled lithium ion batteries contained in equipment. This special permit provides no relief from the Hazardous Materials



U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration PHMSA: Your Safety is Our Mission

2

U.S. Department

of Transportation

Pipeline and Hazardous Materials Safety Administration

PHMSA Resources



U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration



Resources



SHIPPING LITHIUM BATTERIES?

The Pipeline and Hazardous Materials Safety Administration (PHMSA) is one of several Federal government agencies that regulates lithium battery safety, as well as enforces regulations for the safe, reliable, and environmentally sound transportation of hazardous materials.

For information on the safe transport of lithium batteries, visit our Transporting Lithium Batteries webpage at the link below, or via the QR code.

https://phmsa.dot.gov/lithiumbatteries







U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration

Resources



Pipeline and Hazardous Materials Safety Administration Outreach, Engagement and Grants Division



East building, 2nd Floor 1200 New Jersey Ave., SE Washington DC 20590 E-mail: <u>training@dot.gov</u> 202.366.4900 202.366.7342 (Fax)





U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration

Retail Collection

- Todd Ellis, Call2Recycle
- Robert Gass, Lowes
- Micah Day, Stihl

Retail Collection

Todd Ellis, Call2Recycle








SMALL FORMAT BATTERIES: SAFE COLLECTION, STORAGE, AND TRANSPORT WEBINAR

Todd Ellis

call2recycle.org

©2024 Call2Recycle, Inc. All rights reserved.

How Does a Battery Get Recycled -Call2Recycle





 $[\rightarrow$

How Batteries are Collected & Recycled – Collection



- Call2Recycle partners with existing sites to collect used batteries.
- Call2Recycle has approximately 12,000 partner sites colleting used batteries for recycling.
- Call2Recycle's collection partners are spread throughout the U.S. and include
 - Public Agencies
 - Retailers
 - Businesses
 - Municipalities





 \rightarrow

Collection Site Materials & **Training**





 \rightarrow

How Batteries are Collected & Recycled -Sorting



- Once collected at a partner site, batteries are first shipped to a "sorting" location.
- Call2Recycle has four "sorting" location partner sites.
- Once at the sorter, each box/shipment is weighed and recorded. The batteries are then consolidated and shipped in trailer loads to a Call2Recycle, vetted downstream recycler.



 $|\rightarrow$

How Batteries are Collected & Recycled -Processing



- Call2Recycle uses a network of more than a dozen material processes to recycle the collected batteries.
- These processes are vetted by Call2Recycle through internal and external audits and must be approved by Call2Recycle's Board of Directors.
- Batteries collected through the Call2Recycle program are not reused.
- Most battery packs/cells are recycled as is, but some may require dismantling prior to being recycled.



 $|\rightarrow$



Leading the charge for recycling.[™]

hank you.

Todd Ellis tellis@call2recycle.org 678-218-4590

Corporate headquarters: 1000 Parkwood Circle, Suite 200 Atlanta, GA 30339

call2recycle.org

Retail Collection

Robert Gass, Lowes



Retail Collection

Micah Day, Stihl





Manufacturers' Role In Recycling

The STIHL Inc. Perspective

Micah Day, Hazardous Materials Specialist, Legal 05/10/2024

Manufacturers' Role in Recycling

Industry is Your Partner

- STIHL Inc. voluntarily funds its participation in Call2Recycle's Rechargeable Battery Program to make certain every battery sold in the US has a prepaid end-of-life solution.
- By actively involving Industry in the discussion, best practices can be developed that also help to promote environmentally-responsible battery products, keeping them affordable while also leveraging brand networks to promote end-of-life recycling.
- With Industry engagement, solutions can be found for current topics, such as the concept of "design for recycling", for which we are starting to see legislation in the EU regarding embedded battery products.
- In addition to just working with manufacturers, many industry groups are also dedicated to finding safe recycling solutions, as well as keeping the battery industry viable.
 - Examples: Outdoor Power Equipment Institute (OPEI), Portable Rechargeable Battery Association (PRBA), Power Tool Institute (PTI)



internal

Manufacturers' Role in Recycling

What is involved in planning?

The Consumer

- Partnership with Call2Recycle's Rechargeable Battery Program
- Quarterly Licensing Fees
- Program Seals (Marks and Labels) on batteries
- Consumer awareness

The Commercial Consumers

Materials of Trade Guidance

The Manufacturing Process

- EPA Regulations
 - Small Quantity Handlers of Universal Waste (SMHUW)
 - Large Quantity Handlers of Universal Waste (LQHUW)
 - Tracking Universal Waste
- DOT
 - DDR
 - Universal Waste vs. Hazardous Waste
- OSHA's Role in hazard communication
- Global Coordination

STIHL

Manufacturers' Role in Recycling

Challenges to Recycling in General

- Overall knowledge on the difference between a normal battery and a DDR battery and how to handle them
- Changes in UN regulations on the classification of Lithium-Ion Batteries
- Piece-meal, Independent State EPR Legislation
- Stewardship Program Free-riders
- Counterfeit batteries and safety
- Transportation carriers
- Safe collection locations

In most organizations, you will find experts that are ready to work collaboratively to address, educate and mitigate recycling challenges with a huge reach to the consuming public.

STIHL





MICAH DAY

- STIHL HAZARDOUS MATERIALS SPECIALIST, LEGAL OPEI, BATTERY ELECTRIC PRODUCTS COMMITTEE CHAIRMAN
- PTI, MEMBER

State and Local Government Perspectives

Megan Warfield, Washington State Department of Ecology

Deb Ferraro, City of Mesa Environmental & Sustainability Department **Billy Puk**, Santa Clara County

State and Local Government Perspectives

Megan Warfield, Washington State Department of Ecology





Battery Product Stewardship

- E2SSB 5144 Providing for responsible environmental management of batteries
- Codified as Chapter 70A.555RCW
- Create a statewide system for the collection and recycling of batteries
- Use of "environmentally sound management practices"
- Many types of batteries covered





Best Practices for Battery Collection

- Make it convenient
 - 95% of residents must have 1 permanent collection site within 15 miles
 - 1 additional site for every 30,000 residents in an urban area
 - Consideration given to overburdened populations and vulnerable communities
- Make it easy: accept all chemistries
- Training to collection sites
- Resources to provide oversight







Challenges

- Working within existing regulatory framework
 - Solid waste regulations
 - Hazardous waste regulations (universal waste rules)
 - International Fire Code
 - U.S. DOT transportation regulations
- Staffing & resources to provide oversight
- Damaged batteries



Thank you

https://ecology.wa.gov/Waste-Toxics/Reducing-recycling-waste/Our-recyclingprograms



Megan Warfield 360-701-9683 megan.warfield@ecy.wa.gov



State and Local Government Perspectives

• Deb Ferraro, City of Mesa Environmental & Sustainability Department





- Increase in battery-related fires beginning in 2022
 - Currently averaging 3 fires / month
- Water not sufficient to keep fires out
- City was not prepared to respond
- Fires at residential and business locations and in solid waste trucks







- Reached out to existing emergency response contractors for better solutions
- Who would be prepared to assist with emergency response:
 - DOT Damaged Defective Recalled (DDR) Permit
 - Equipment roll-offs, skid steers, loader
 - Materials Cell Block EX, fire blankets, high heat gloves
- Contract addendum with new pricing







- Worked with Mesa Fire Department
- Lithium-Ion Battery Fire Response Buckets
 - Cell Block EX
 - High heat gloves
 - Response Procedure
- Buckets now located on all 3 HazMat Trucks
- Prepared for recycling of DDR batteries







Prepared for the EPA Battery Webinar - May 14, 2024



Preventive Measures

- Used Battery Procedure for City Operations
- Taping of high energy batteries and damaged batteries
 - All batteries over 9V
 - All lithium and lithium-ion batteries w/ exposed terminals
 - Electronic batteries with cracked plastic casing
- Additional staff training





State and Local Government Perspectives

• Billy Puk, Santa Clara County



Household Hazardous Waste (HHW) Program



- "Household hazardous waste" means hazardous waste generated incidental to owning or maintaining a place of residence. Household hazardous waste does not include waste generated in the course of operating a business concern at a residence. (HSC 25218.1(d))
- HHW Program is a result of mandatory HHW element written in all integrated solid waste management plan in all jurisdictions in California.

Conservatorship Program/ Public Guardian Service



- Public Guardian or Conservator Program serves adults with cognitive impairments by managing their personal and financial needs after a legal proceeding with a judge appointment.
- If Santa Clara County were appointed by court to assist the adult and/or to manage his/her estate as public conservator, the County has the responsibility to clear this adult's home after the passing in preparation for probate court.
- Hazardous materials found in adult's home after passing = HHW
- Most <u>common waste s</u>tream:
 - 1) Household batteries,
 - 2) electronic waste,
 - 3) pharmaceuticals,
 - 4) sharps and
 - 5) other weird waste materials (i.e. fireworks, ammunition, lab chemicals).

Unhoused Population: San José BeautifySJ



- 1. Unhoused/Homeless = Residents
- 2. Recreational vehicles and other lived-in vehicles
- 3. Tents encampment
- 4. Removal services:
- Biowaste (sharps & human waste),
- Regular trash



Household batteries, paint, used motor oil, etc. hazardous waste materials

CA upcoming EPRs



- 1. AB 2440 (2022) loose batteries EPR
 - a) Law: <u>https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB2</u> <u>440</u>
 - b) State Information website: <u>https://calrecycle.ca.gov/epr/batteries/</u>
- 2. SB 1215 (2022) embedded batteries
 - a) Law: <u>https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB1</u> 215
 - b) State Information website:

https://calrecycle.ca.gov/electronics/embeddedbatteries/



Billy Puk

408-918-1967

billy.puk@cep.sccgov.org www.hhw.org





End of Life/Next Life

Ryan Nolte, Recycled Materials Association



Fire Issues in Recycling & MRF Facilities

Dr. Ryan Nolte Sr. Director of Safety Outreach Recycled Materials Association

May 14, 2024



recycledmaterials.org

Fires in Recycling Facilities





Type of Facility Affected by Year

Source: https://www.epa.gov/system/files/documents/2021-08/lithium-ion-battery-report-update-7.01_508.pdf



Why this is an issue



Association

 Both domestic and imported batteries are entering recycling streams at an increasing rate

 Demand is increasing while the ability to handle, store, ship, and recycle is not keeping up

 Financial constraints to recycle batteries

Small Lithium

Primary and Lithium-

Ion Batteries


Common Devices with Lithium Batteries

Examples of common electronic devices containing lithium cells or batteries

Video cameras	Walkie talkies (2 way radio)	GPS devices	Radio controlled toys
Cameras	Scanner	Cellular Phones	MP3 players
Bluetooth headsets	Smartphones/mobiles	Laptop computers	Shavers
			Ĩ
Power Drills	Tablets	Portable DVD players	Measuring equipment
-12			







Tire Pressure Sensors



Vape Devices Left in Cars

Key Fobs

Shopping Cart Wheels













Drone Batteries

Small Batteries Mixed with Metal



Automatic Faucets





Digital Water Meters







Recycled Materials Association

Handheld Power Tools



Power Tools



Handling Lithium

Batteries



Damaged, Defective, Recalled (DDR) Batteries

DDR batteries have different safety

requirements from EOL batteries

DDR batteries have different shipping requirements from EOL batteries

DDR batteries need to be managed separately from EOL batteries











Identifying DDR Batteries



Recycled Materials Association







DDR Lithium Batteries Proper Storage





DDR Lithium Batteries Proper Storage



Picture 18. Example of procedure for filling a LIB barrel (Source: INOBAT, LIB barrel)



Storage of Non-DDR Batteries

Store batteries and devices in locations with temperatures not to exceed 90°F

Remove batteries from devices for longterm storage

Keep charged and depleted batteries separate

Cover the contacts with electrical, clear packing, or duct tape

Place individual batteries in separate plastic bags







Thank You



recycledmaterials.org

Wrap up/next steps

Pat Tallarico, ERG Team

Upcoming Small Format Consumer Electric and Portable Batteries Working Sessions

	Meeting Focus	Meeting Topic	Meeting Date	Meeting Time	Format
\checkmark	Labeling and Collection	Kickoff: Current Landscape and Engagement Overview	March 19, 2024	2:00-3:30 PM EDT	Virtual
\checkmark	Collection	Collection Systems and Locations	April 11, 2024	2:00-4:00 PM EDT	Virtual
	Labeling and Collection	Tribal Waste Management Webinar	May 2, 2024	1:00-3:00 PM EDT	Virtual
	Collection	Safe Collection, Storage, and Transport	<mark>May 14, 2024</mark>	2:00-4:00 PM EDT	<mark>Virtual</mark>
	Labeling	In-Person Meeting Participant Prep Call (placeholder)	June 6, 2024 (TBD)	TBD	Virtual
	Labeling	In-person Intensive Session: Label Contents	June 12-14, 2024	9:00 AM-4:00 PM EDT	In-Person
	Collection	Education and Outreach	June 20, 2024	2:00-4:00 PM EDT	Virtual
	Labeling	Report Out from In-Person Intensive and Additional Input	July 16, 2024	2:00-4:00 PM EDT	Virtual



Next Steps

- Register for the June 20 Small Format Batteries: Education and Outreach webinar: <u>https://www.zoomgov.com/webinar/register/WN_leV</u> <u>clIqHTGiLmFzWG3yvdg</u>
- Email <u>batteries@epa.gov</u> if you have an interesting story to tell about consumer education and outreach

