

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment



August 4, 2023

Carin Stuart, Steward Relations Manager
Call2Recycle
1000 Parkwood Circle, Suite 200
Atlanta, GA 30339

Re: Approval of Call2Recycle's Revised District Battery Stewardship Plan, submitted August 4, 2023

Dear Ms. Stuart:

This letter presents the determination of the Department of Energy & Environment (DOEE) on Call2Recycle's Revised District Battery Stewardship Plan, submitted August 4, 2023 ("revised plan").

DOEE has determined that the revised plan complies with the requirements of [D.C. Official Code § 8-771.03\(a\)](#) and [20 DCMR § 3900 et seq.](#) Accordingly, we are approving the revised plan. We have also attached the final version of the plan to this letter.

[D.C. Official Code § 8-771.02\(b\)](#) states: "A battery stewardship organization shall implement the battery stewardship plan no later than 90 days after the plan is approved." As DOEE is approving this plan on August 4, 2023, the deadline for implementation of this plan is November 2, 2023.

DOEE appreciates your dedication to ensuring the plan meets the requirements of the battery stewardship law and regulations. We look forward to working with you as the District's battery stewardship program moves forward.

Sincerely,

A handwritten signature in black ink that reads "Maribeth DeLorenzo".

Maribeth DeLorenzo
Deputy Director
Urban Sustainability Administration

Call2Recycle, Inc.

Changing habits. Inspiring action.™

DISTRICT BATTERY STEWARDSHIP PLAN

*Pursuant to
D.C. Official Code § 8-771.01 to .10*

Submitted to:
District of Columbia
Department of Energy & Environment
1200 First Street NE
Washington, DC 20002
productstewardship@dc.gov



Final Plan Approved August 4, 2023

Submitted by:
Call2Recycle, Inc.
1000 Parkwood Circle, Ste. 200
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I. INTRODUCTION

Call2Recycle, Inc., which administers the Call2Recycle® program, is a non-profit, public service organization. Since 1996, on behalf of battery producers, Call2Recycle has managed a rechargeable battery collection and recycling program in the District. Call2Recycle, Inc. is registered as a battery stewardship organization (“BSO”) under the District’s battery stewardship law. Pursuant to D.C. Official Code § 8-771.04(a)(1), Call2Recycle, Inc. is submitting this plan to the District to create and manage a mandatory battery stewardship program for all battery chemistries, expanding its existing rechargeable program to include primary batteries.

Call2Recycle's plan builds and learns from the past 25+ years of operating in the District. With the participation of the District, retailers, businesses, manufacturers, and residents, and the passage of the District's extended producer responsibility legislation, Call2Recycle seeks to enable the District to collect primary and rechargeable batteries. Per § 8–771.01, an in-scope primary battery is defined as a non-rechargeable battery that weighs 4.4 pounds (2 kilograms) or less, including alkaline, carbon-zinc, and lithium metal batteries, and an in-scope rechargeable battery is defined as a battery that contains one or more voltaic or galvanic cells, electrically connected to produce electric energy, designed to be recharged, that weighs less than 11 pounds (5 kilograms) and has a Watt-hour rating of no more than 300 Watt-hours, unless an exclusion applies. Further references to primary and rechargeable batteries in this plan mean the batteries meet these definitions in the D.C. Code.

A. The District Battery Law and Regulations

The amendments to the Sustainable Solid Waste Management Amendment Act of 2014 require the battery stewardship organization to submit a Battery Stewardship Plan to the District Department of Energy and Environment (“DOEE”) for review and approval.

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

(a) A proposed battery stewardship plan shall include, at a minimum:

(1) A list of producers and brands, including:

(A) All producers participating in the battery stewardship plan and contact information for each of the participating producers;

(B) The brands of batteries and battery-containing products covered by the battery stewardship plan; and

(C) Brands of products meeting the exemption described in § 8-771.01(2)(B) that contain batteries supplied by producers participating in the battery stewardship plan;

(2) An anticipated annual budget for the battery stewardship plan, broken down into administrative, collection, transportation, disposition, and communication costs, along with a description of the financing method used to implement the battery stewardship plan. The budget shall fund, at a minimum, staff responsible for implementing the battery stewardship plan in the District and include funds for fees administered by DOEE. The budget may not include legal fees or costs related to legislative efforts;

(3) Economically and technically feasible performance goals for each of the first 3 years of implementation of the battery stewardship plan that are based on the estimated total weight of primary and rechargeable batteries that have been sold in the District in the previous 3 calendar years by the producers participating in the battery stewardship plan;

(4) A description of how the battery stewardship organization will provide for the convenient collection of primary and rechargeable batteries from consumers as required by § 8-771.02(a). At a minimum, the battery stewardship plan shall provide for a minimum of one collection site per 10,000 people in the District, with a

reasonable geographic spread of collection sites across all 8 wards, taking into account accessibility to public transit, and an explanation for the geographic spread; except, that DOEE shall not require the collection site minimum in this paragraph to be met in the first year of implementation of the plan if the plan provides a reasonable timetable for achieving that requirement;

(4A) A description of how the battery stewardship organization will develop strategies, in consultation with DOEE and other relevant parties, for collecting primary and rechargeable batteries in areas and communities that face environmental justice challenges associated with waste management;

(5) A description of how the battery stewardship organization will arrange for components of the discarded batteries to be recycled to the maximum extent economically and technically feasible, in a manner that is environmentally sound and safe for waste management workers;

(6) A list of all key participants in the battery collection program, including:

(A) The names of the collection sites accepting batteries under the plan, including the address and contact information for each collection site;

(B) The name and contact information of a transporter or contractor collecting batteries from the collection sites; and

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

(7) A description of the education and outreach that will be used to inform consumers about the battery collection program, which must, at a minimum, notify the public that there is a free collection program for all primary and rechargeable batteries as well as the location of the collection sites and how to access the battery collection program; and

(8) Other information as required by the Mayor through rulemaking.

The plan must also meet the requirements for battery stewardship plans in Title 20, Chapter 39, of the District of Columbia Municipal Regulations (“DCMR”).

B. Citations

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

II. STEWARDSHIP ORGANIZATION

A. Citations

Statutory Citation

(b) Beginning January 1, 2022, and annually thereafter, a battery stewardship organization shall file a registration form with DOEE. The registration form shall require the following information:

(1) A list of the producers participating in the battery stewardship organization;

(2) For each participating producer, the name, address, and contact information of a person responsible for ensuring the participating producer's compliance with this chapter;

(3) A description of how the battery stewardship organization proposes to meet the requirements of subsection (a) of this section, including any reasonable requirements for participation in the battery stewardship organization; and

(4) The name, address, and contact information of a person for a nonmember producer to contact on how to become a member of the battery stewardship organization.

Regulatory Citation

Regulations establishing requirements for battery stewardship organizations can be found at 20 DCMR 3900.

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 funded by battery and product manufacturers committed to responsible recycling.

Founded in 1994 as the Rechargeable Battery Recycling Corporation (RBRC), Call2Recycle is the first and most extensive U.S. consumer battery stewardship program, collecting used primary and rechargeable batteries and used cellphones. The Call2Recycle program has operated in the District since its collection program launched in 1996.

Call2Recycle, Inc., is led by an experienced [Senior Leadership Team](#) and governed by its [Board of Directors](#).

C. Management and Administration

Call2Recycle, Inc., is responsible for the management and administration of the program, including, but 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 District government
- Collection of stewardship fees through a process that ensures the confidentiality of data
- Defining and meeting the performance management targets for the program, including a plan for continuous improvement
- Ensuring compliance with all applicable District, 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 PRODUCERS AND BRANDS

A. Citations

Statutory Citation

(a) A proposed battery stewardship plan shall include, at a minimum:

(1) A list of producers and brands, including:

(A) All producers participating in the battery stewardship plan and contact information for each of the participating producers;

(B) The brands of batteries and battery-containing products covered by the battery stewardship plan; and

(C) Brands of products meeting the exemption described in § 8-771.01(2)(B) that contain batteries supplied by producers participating in the battery stewardship plan;

Regulatory Citation

3902.1 A proposed battery stewardship plan shall include:

(a) A list of producers and brands, including:

- (1) The name of each BSO member and the name, mailing address, phone number, and email address of a contact for each BSO member;*
- (2) The brands of batteries and battery-containing products covered by the battery stewardship plan; and*
- (3) A description, including brand name, product name, producer name, and other identifying information, of products that will be exempt under § 3901.2 when the proposed battery stewardship plan is approved;*

B. Battery Producers and Brands

As of July 7, 2023, 194 producers, representing 478 brands, have designated Call2Recycle, Inc. as their battery stewardship organization to fulfill their compliance requirements under the District's battery stewardship law. These producers will finance primary and rechargeable battery collection and recycling in the District by paying fees based on the total weight of in-scope batteries sold into the jurisdiction.

A listing of producers and their contact information, as well as covered brands partnering with Call2Recycle to comply with the District battery stewardship law, can be found in Appendix A. Upon the program's launch, currently planned for November 1, 2023, Call2Recycle will provide the District with a final list of Call2Recycle District program stewards, which are BSO "members" as described in the District's battery stewardship law and regulations.¹ Please note that Call2Recycle may adjust timing depending on final plan approval.

Call2Recycle will utilize The District of Columbia Battery Stewardship Exemption Certification document to formalize the implementation of the exemption described in section 20 DCMR § 3901.2(a) and (b). At the date of submittal of this revised plan, no battery-containing product is exempt, and no battery-containing product will be exempt upon plan approval unless the producer of each primary or rechargeable battery contained in the product or packaged with the product at the time of sale has complied with the requirements of 20 DCMR § 3901.2(a) and (b). As of August 1, 2023, one producer has started the process to exempt a battery-containing product under 20 DCMR 3901.2. Appendix A includes a description of the product, including brand name, product name, producer name, and other identifying information, that will be exempt under § 3901.2 when the proposed battery stewardship plan is approved.

C. Free Collection

With funding from participating producers, Call2Recycle's collection and recycling program will be offered to District consumers at no cost, to accept all batteries meeting the legal definition of a battery as described in the Introduction. In addition, participation in the Call2Recycle program as a battery collection site (assuming the entity meets the collection site criteria listed in Section VI of this Plan) is open at no cost to all retailers and other entities, such as solid waste management facilities, as long as the sites meet Call2Recycle's standards, including completing an online safety tutorial. Conversely, no organization is required to participate as a collection site.

IV. ANTICIPATED BUDGET & FINANCING

A. Citations

¹ The term "members" as used in this plan relates solely to participation in the District Battery Stewardship Plan and has no other legal meaning.

Statutory Citation

(2) An anticipated annual budget for the battery stewardship plan, broken down into administrative, collection, transportation, disposition, and communication costs, along with a description of the financing method used to implement the battery stewardship plan. The budget shall fund, at a minimum, staff responsible for implementing the battery stewardship plan in the District and include funds for fees administered by DOEE. The budget may not include legal fees or costs related to legislative efforts;

Regulatory Citation

(b) An anticipated annual budget for the plan's implementation that:

(1) Covers the first partial calendar year, if any, of battery stewardship plan implementation and the first full calendar year of implementation following any partial year;

(2) Lists separate line items for the following categories: (A) Battery stewardship plan administration costs; (B) Collection costs;

(C) Transportation costs;

(D) Disposition costs, including separate line items for the cost of recycling, other processing, and end-of-life handling; and

(F) Communication costs, which shall have the same meaning as public education program costs used in § 3900.1(d) and public education and outreach program costs used in § 3903.3(k)(1);

(3) Describes the financing method used to implement the battery stewardship plan, identifies funding for staff responsible for implementing the battery stewardship plan in the District, and includes DOEE administration fees established by § 3907; and

(4) Does not include legal fees or costs related to legislative efforts;

B. Pro Forma Budget

The following is the budget for the calendar years 2023 – 2024. Note that 2023 includes the program being operational for just the last two months of the calendar year per the dates in the regulation as enacted. Also, since the final program participants will not be known before November 1, 2023, the revenue (and implied collections) shown below reflects estimated producer fees.

This will be updated and submitted around the program's launch, scheduled for November 1, 2023.

The collection rate used to determine collection expenses reflects the performance goals discussed in Section V. The definition of the categories of "costs" are as follows:

- "**Collections**" includes the costs for manufacturing the collection kits including the containers; bags; additional collection materials which are collateral and related material which includes kiosks and in-store signage; the costs for managing the kits in inventory; and the costs for picking and managing the orders for the kits. All battery stewardship plan collection sites in the program must use Call2Recycle's own collection kits.
- "**Transportation**" includes the costs of shipping collection kits to a collection site, the costs of shipping collection kits to sorters or consolidation facilities, and the costs of shipping the sorted material to downstream processors. These costs were estimated based on insights gleaned from the previous 25+ years of operating a rechargeable program in the District and a primary battery program in Vermont.
- "**Disposition**" is the cost for recycling and sorting associated to the downstream treatment. These costs were estimated based on insights gleaned from the previous 25+ years of operating a rechargeable program in the District and a primary battery program in Vermont.

Section VII describes all disposition completed at each processing facility. The breakdown of costs for recycling and management/treatment/disposal (i.e., end-of-life handling) of materials by downstream vendors cannot be separated out therefore only one line item for disposition is provided.

- **“Total Operations”** includes collections, transportation, disposition, and required periodic sorting budgeted for the first two months of the program. In the subsequent year, the budget includes funding for supplemental collection that may be in the form of a mailer, collection events, or other service that supplements permanent collection sites in the District.
- **“Professional fees”** includes the allocated expenses associated with the annual Call2Recycle financial audit and are based on the percentage of fees for the District program as a portion of the national steward program.
- **“Overhead”** includes the costs for information technology (IT), finance, customer service, and other miscellaneous overhead.
- **“Start-Up Costs”** are for the one-time costs incurred in the first two months of the District program set-up for legal support pertaining to Call2Recycle agreement documentation, expansion of the collection footprint, and development costs in advance of the program launch. The budget does not include legal fees or costs related to legislative efforts.
- **“Battery Stewardship Plan Administration”** includes all administrative costs associated with operating the Call2Recycle program in the District including salary & benefits; professional fees; travel, meals, and lodging; overhead; and start-up costs.
- **“Communication Costs”** includes costs for all outreach to all stakeholders, including but not limited to retailers, consumers, and collection sites.
- **“DOEE”** reflects payments prescribed by Law to support the District's program oversight.

**TABLE 1. Battery Product Stewardship Plan – District of Columbia
by Calendar Year**

	Nov. - Dec. 2023**	2024
Revenue		
Primary	\$ 246,390	\$ 492,781
Rechargeable	\$ 8,970	\$ 21,614
TOTAL REVENUE	\$ 255,360	\$ 514,395
Expenses		
<i>Collections</i>	\$ 26,176	\$ 34,879
<i>Transportation</i>	\$ 1,362	\$ 11,445
<i>Disposition</i>	\$ 822	\$ 6,904
<i>Recycling</i>	\$ 329	\$ 2,855
<i>Sorting</i>	\$ 493	\$ 4,049
<i>Annual periodic sort</i>	\$ 10,000	\$ 10,000
<i>Supplemental collection</i>	\$ -	\$ 65,000
Total Operations	\$ 38,360	\$ 128,228
<i>Salary & Benefits</i>	\$ 31,250	\$ 137,500
<i>Professional Fees</i>	\$ 24,775	\$ 47,754
<i>Travel, Meals & Lodging</i>	\$ 5,000	\$ 5,000
<i>Overhead</i>	\$ 23,720	\$ 35,732
<i>Start-up Costs</i>	\$ 15,000	\$ 15,000
Battery stewardship plan administration	\$ 99,745	\$ 240,986
Communication Costs	\$ 45,000	\$ 100,000
DOEE	\$ 40,000	\$ 41,200*
TOTAL EXPENSE	\$ 223,105	\$ 510,414
NET REVENUE / EXPENSE	\$ 32,255	\$ 3,980
Margin %	13%	1%

*Estimated inflation at 3% for budgeting purposes.

** Revenue timeframe is April through December.

Notable highlight of the budget:

- The budget assumes the equivalent of two full employees assigned to the District program, supported by central personnel in communications, finance, operations and IT.

C. Financing the Stewardship Program

The financing of the District's battery stewardship program has been derived from obligated battery producers' fees and obligated battery-containing product producers' fees and approved by the Call2Recycle Board of Directors. Obligated producers are those entities that meet the definition of "Producer" in § 8-771.01(11).

After each calendar quarter, producers as defined in § 8–771.01(11), which includes producers of both covered battery and covered battery-containing products, are required to report their estimated sales of in-scope batteries by weight into District's market for the previous quarter. The reporting is for in-scope battery weight only and not the product that the battery may be powering. If the obligated battery producer cannot break out sales into the District from its national data, estimates of in-scope batteries sold in the District will be calculated by dividing the District's population by the U.S. population (currently 0.20%) and multiplying this figure by the national sales weight. Fees are established by chemistry, given the different costs associated with collecting, handling, sorting, and recycling them. Start-up costs for the District program will be reported for Q2 2023 ahead of program launch in Q4 2023. Start-up costs are financed in the same manner as described above.

Battery weights are reported through Call2Recycle's secure online portal, GreenTrax, which immediately generates an invoice upon completing the sales reporting process. The fees will be adjusted no more frequently than annually, representing the increased costs of continually increasing the amount of in-scope batteries collected.

V. Performance Goals

A. Citations

Statutory Citation

(3) Economically and technically feasible performance goals for each of the first 3 years of implementation of the battery stewardship plan that are based on the estimated total weight of primary and rechargeable batteries that have been sold in the District in the previous 3 calendar years by the producers participating in the battery stewardship plan;

Regulatory Citation

(c) Economically and technically feasible performance goals that:

(1) Include metrics to measure, on an annual basis, the performance of the plan, taking into consideration technical feasibility and economic practicality, in achieving continuous, meaningful progress to improve the rate of battery recycling in the District;

(2) Cover each of the first three (3) full calendar years of battery stewardship plan implementation;

(3) Discuss how the BSO will address performance goals during the first partial calendar year, if any, of battery stewardship plan implementation;

(4) Are in the form of target collection rates, target recycling efficiencies by battery recycling process, and measurable goals for public awareness, convenience, and accessibility;

(5) With respect to target collection rates, are based on the estimated total weight, calculated according to § 3904, of primary and rechargeable batteries, including batteries contained in or sold with battery-containing products, that are sold in the District in the previous three (3) calendar years by the BSO members;

(6) With respect to goals for recycling efficiencies by battery recycling process:

(A) Include a method for calculating recycling efficiency; and

(B) Provide target recycling efficiencies by battery recycling process;

(7) With respect to goals for public awareness:

(A) Increase the percentage of people in the District who know how to recycle primary and rechargeable batteries through stewardship plan collection sites; and

(B) Include measures to evaluate progress in increasing public awareness in the District, such as advertising and media impressions and social media engagement; and

(8) With respect to goals for convenience and accessibility, include metrics to evaluate:

(A) The proximity of collection sites to residents in all eight (8) District wards;

(B) The extent to which collection sites across the District are open to the public, including the hours and days that collection sites are open and whether there are any limitations on public entry;

(C) Accommodations for people with limited or no English proficiency; and

(D) The availability and effectiveness of any mail-back or other program proposed under § 3902.3;

B. Collection Rates

For two months in 2023, Call2Recycle is proposing a collection rate of 0.35% based on data from other jurisdictions, program modifications, and assumptions. This rate, which equates to 2,000 lbs. is for just two months of CY2023 as the program increases collection sites, consumer outreach, and education. This is compared to 5,042 lbs. batteries collected in the District for a full year in 2022. Subsequent years' proposed collection rates will increase as collection sites are established and sufficient time has passed to educate and positively impact consumer behavior.

This rate is different when compared with other Nations, Provinces, and Jurisdictions because different historical factors influence consumer behavior to recycle batteries at end of life. For example, in Vermont, long-established consumer behavior has been for residents to know that batteries can be recycled at end of life and to take the appropriate action to recycle batteries. Therefore, at the start of the program, we considered this longstanding and pre-existing consumer behavior activity and anticipated a high collection rate early in the Vermont program. In Europe, it has been a longstanding consumer behavior to recycle many items, including batteries, many years before the 2006 Battery Directive was made effective. Therefore, consumers were already accustomed to recycling batteries and resulting in initial collection rates in most countries in 2006 meeting the higher criteria in the Battery Directive. As this is not the case in the District, a key objective of the Education and Outreach plan is to educate consumers in the District that batteries can and must be recycled, and then motivate them to take action by recycling them. This takes time through multiple exposures in messaging to achieve a shift in consumer behavior.

The District Battery Stewardship Law is the first U.S. extended producer responsibility regulation for all consumer primary and rechargeable batteries. As such, no historical U.S. data nor internal primary battery data is available for Call2Recycle to develop the initial plan's collection rate target or to compare its ongoing performance.

Therefore, to estimate the average weight of rechargeable batteries offered for sale² in the previous 3 years Call2Recycle used the past 3-year average of the reported rechargeable program data, with the removal of batteries that are embedded in covered electronic equipment, for the national Call2Recycle program and proportionally reduced the total U.S. numbers to the District of Columbia using population as the reducing metric. However, there are many new stewards joining the program in 2023 because of the District's implementing regulations which are not reflected in this historical data.

For primary batteries, Call2Recycle used the historical data for Vermont as the basis for the total weight of primary batteries offered for sale in the previous three years by stewards. However, the

² Call2Recycle uses data on batteries offered for sale as the basis for determining collection rates as this is the only industry data that is available.

Vermont law only requires stand-alone replacement batteries to support collection and recycling of batteries, not primary batteries offered for sale in a device. The total weight of primary batteries sold in or with devices in the District is currently unknown, as Call2Recycle does not have historical data to use for calculating.

Projecting collection rate targets four years into the future proved challenging and while they are estimates only, they do represent Call2Recycle's commitment to continuous improvement. Call2Recycle will submit updated average sales weight (serving as the denominator for the collection rate) to the District once it collects the sales data from its producers. Starting at the end of the 2024 calendar year, Call2Recycle will provide the updated average sales weight for the calendar year in our annual report.

In accordance with 20 DCMR 3900.1(h) Call2Recycle will submit amended performance goals 2 years after the plan is approved and every two years after that, which may include adjusted collection rates.

To support continuous and meaningful progress toward increasing the performance goal of the recycling rate, Call2Recycle has developed an outreach and education plan in Section XI.

**TABLE 2: Battery Collection Rates – District of Columbia
Collection Rates by Calendar Years**

	2023 **	2024	2025	2026
Target Collection Rate	0.35%	2.5%	4.5%	6.5%
Average sales weight offered for sale by Call2Recycle Stewards (lbs.) in 3 previous calendar years	615,478 (2020-2022)	640,097 (est. 2021-2023)*	665,701 (est. 2022-2024)*	692,329 (est. 2023-2025)*
Estimated Batteries to be Collected (lbs.)	2,000	16,000	30,000	45,000

* Based on per capita of U.S. sales and an estimated percentage of participating brands. See "Budget" above. For the years 2024 – 2026, a 4% sales inflation rate was used.

** Note that collections are for two months (November – December) only.

C. Recycling Efficiency Rates (RER)

While every take-back program aims to optimize the amount of material collected, it is equally essential to maximize the amount of material that can be reclaimed for secondary use. This measure in the battery recycling industry is referred to as the recycling efficiency rate (RER). In short, RER is the percentage of battery weight received that is not lost in the recycling process and used in secondary products or materials. RER is calculated by dividing the material recovered from waste in-scope batteries by the total mass of the waste in-scope batteries that were sent for recycling. The scope of RER is limited to the facility that receives and processes batteries. RERs are self-reported via attestation by processors. As a note, subsequent downstream facilities to Call2Recycle approved processors are often fluid and commercially protected. As such "as far down the recycling chain as Call2Recycle has visibility" is commonly the same as "the first facility the batteries are sent to". The RERs outlined in VII will be met in year 1 and re-evaluated every two years as required by District law.

The worldwide standard for RER can be found in the [European Union's 2006 Battery Directive](#). In Annex III of this Directive, the RER is prescribed as:

PART B: RECYCLING

3. Recycling processes shall achieve the following minimum recycling efficiencies:

- (a) recycling of 65 % by average weight of small sealed lead-acid (SSLA) batteries and accumulators, including recycling of the lead content to the highest degree that is technically feasible while avoiding excessive costs;*
- (b) recycling of 75 % by average weight of nickel-cadmium batteries and accumulators, including recycling of the cadmium content to the highest degree that is technically feasible while avoiding excessive costs; and*
- (c) recycling of 50 % by average weight of other waste batteries and accumulators.*

All recycling processors under this plan will meet or exceed the RER's currently in effect in the European Union.

TABLE 3 Target RER in years 2023 through 2026

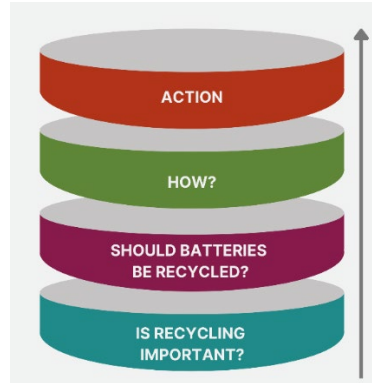
Battery Type	SSLA	Ni-Cd	Alkaline, Lithium Primary, Li-Ion, Ni-MH
Target RER	65%	75%	50%

D. Public Awareness

Consumer awareness takes time to develop, especially for new or unfamiliar recycling options. While Call2Recycle will help influence positive consumer awareness through various efforts (as outlined in Section IX), it is equally as important to understand the effectiveness of the outreach and education strategies being used to reach those target audiences.

Therefore, Call2Recycle routinely measures consumer awareness regarding key indicators of battery recycling. It views consumer awareness as a series of ascending knowledge about recycling with the goal of ever-increasing this knowledge. First, and most importantly, consumers must acknowledge that recycling is important. Second, they must recognize that primary and rechargeable batteries

must be recycled once the disposal ban goes into effect for all people in the District. Next, they must generally know how to recycle their primary and rechargeable batteries. Finally, they must be motivated to act on this knowledge. The graphic below shows this ascending awareness.



While collection rate is the best indicator of program performance, the act of returning primary and rechargeable batteries for collection should not be expected unless a consumer believes that primary and rechargeable batteries should be recycled and they know how to recycle them [NOTE: generally speaking, the public believes that recycling is a positive behavior]. As a complement to the collection rate measure (outlined in Section B under Performance Goals), this plan will track: 1) whether consumers know that primary and rechargeable batteries can be recycled; and 2) if they have recycled primary and rechargeable batteries.

In 2022, Call2Recycle utilized a third-party research firm to conduct a consumer online survey using quotas and weighting to ensure that the survey sample composition reflected that of the District population according to census information. This research helped to establish a baseline of battery recycling awareness and incidence in the District, which was used to guide the education and outreach strategies and tactics. Call2Recycle will conduct the same or similar research annually to measure the impact of its education efforts. Increasing awareness and behavior at scale is a process that requires significant time and effort. Call2Recycle commits to gradually increasing battery awareness and behavior recycling by one (1) percent each year from 2023 until 2026.

Consumer Awareness & Behavior	Baseline (2022)	2023	2024	2025	2026
Awareness % of consumers who believe that household batteries (primary and rechargeable) can be recycled in the District	69%	69%	70%	71%	72%
Incidence/Behavior % of consumers who recycled their batteries in the District in the past 12 months.	53%	53%	54%	55%	56%

E. Convenience and Accessibility

With respect to goals for convenience and accessibility, Call2Recycle is including metrics to evaluate three specific subjects, as outlined below.

1) **The proximity of collection sites to residents in all eight (8) District wards;**

Until the end of 2024, the requirement to have a “reasonable geographic spread of collection sites across all eight (8) District wards that takes into account accessibility to public transit and areas where people would seek to recycle batteries” will also serve as this performance goal, although it will still be a requirement. At the end of 2024, this proximity goal will be reevaluated for 2025 and after.

2) **The extent to which collection sites across the District are open to the public, including the hours and days that collection sites are open and whether there are any limitations on public entry;**

Beginning in 2023 through 2026, Call2Recycle will meet that at least 65% of all public collection sites will have hours outside of 8 am to 5 pm M-F.

3) **Evaluate accommodations for people with limited or no English proficiency.**

Metric: (a) Call2Recycle will include in its collection site setup a question to each site about what languages besides English, out of the six language access languages, they would like to receive signage in and (b) Call2Recycle will send the materials to each site that requests translated materials.

Goal: completion of (a) for all sites and (b) for those that request materials.

Call2Recycle will provide a mechanism for non-English speaking residents to receive assistance with finding a drop off location. Future metrics may include the number of downloads of translated collateral and number of interactions with language services, which may include chat, call center, locator, and website. In accordance with 20 DCMR 3900.1(h) Call2Recycle will submit amended performance goals 2 years after the plan is approved and every two years after that, which will include additional metrics to evaluate accommodations for people with limited or no English proficiency.

VI. COLLECTIONS & ACCESSIBILITY

A. Citations

Statutory Citation

(4) A description of how the battery stewardship organization will provide for the convenient collection of primary and rechargeable batteries from consumers as required by § 8-771.02(a). At a minimum, the battery stewardship plan shall provide for a minimum of one collection site per 10,000 people in the District, with a reasonable geographic spread of collection sites across all 8 wards, taking into account accessibility to public transit, and an explanation for the geographic spread; except, that DOEE shall not require the collection site minimum in this paragraph to be met in the first year of implementation of the plan if the plan provides a reasonable timetable for achieving that requirement;

(4A) A description of how the battery stewardship organization will develop strategies, in consultation with DOEE and other relevant parties, for collecting primary and rechargeable batteries in areas and communities that face environmental justice challenges associated with waste management;

Regulatory Citation

(d) A description and explanation of the BSO's proposed battery collection program, including:

(1) How the BSO will provide for the collection from consumers of all primary and rechargeable batteries, including batteries contained in or sold with battery-containing products, on a free, regular, convenient, and accessible basis;

(2) How the BSO will meet the following requirements:

(A) At least one (1) collection site per ten thousand (10,000) people in the District;

(B) A reasonable geographic spread of collection sites across all eight (8) District wards that takes into account accessibility to public transit and areas where people would seek to recycle batteries;

(C) Safe and legal collection, handling, and shipment of batteries by the collection sites, including ensuring that each collection site is aware of and adheres to applicable laws and regulations and safety practices for the collection, handling, and shipment of batteries; and

(D) How the BSO will ensure each collection site has the materials and equipment necessary to handle up to one hundred (100) batteries per visit and has established a regular pick-up schedule to prevent overflow issues at the site;

(3) A reasonable timetable for achieving the requirements of § 3902.1(d)(2)(A) and (B), if these requirements will not be met within the first year of implementation;

(4) A process for decommissioning collection sites, so that if a site closes, any batteries collected until the closure will be shipped to the proper facilities for recycling as specified in § 3902.1(e), on-site signage about the availability of drop-off will be removed, and the site will be removed from the public list of collection sites as specified in § 3902.5; and

(5) How the battery stewardship organization will develop strategies, in consultation with DOEE and other relevant parties, for collecting primary and rechargeable batteries in areas and communities that face environmental justice challenges associated with waste management.

B. Collections

Call2Recycle provides a safe, compliant, and free recycling solution for in-scope, consumer batteries. The program is offered at no cost to sites and the public dropping off their primary and rechargeable batteries covered under the law. Before the enactment of this regulation, Call2Recycle had more than 30 active, public and private rechargeable battery collection sites voluntarily accepting used rechargeable batteries from consumers in District.

Upon approval of the Plan, Call2Recycle will increase its recruiting efforts to add additional collection sites to the program. Call2Recycle's recruitment efforts will occur in the below phases to achieve the requirement of maintaining a minimum of 70 active, public collection sites with a reasonable geographic spread across all eight Wards that takes into account accessibility to public transit and areas where people would seek to recycle batteries in the District by December 31, 2024.

Phase 1- Timing: August – November 2023

- Conversion of Existing Sites.
 - Audience: Conversion & On-Boarding of existing rechargeable battery sites to all battery, public collection sites.
 - Total Sites: 6 Sites (includes existing Call2Recycle rechargeable battery only collection sites.) The intent of converting these sites is to establish a foundation of sites very quickly within the District. These sites are existing, participating collection sites – these will not be spread evenly throughout the Wards.

Phase 2- Timing: August – December 2023

- Step One: Conversion of Existing E-bike Sites.
 - Audience: Conversion & On-Boarding of existing e-bike battery collection sites to all battery, public collection sites.
 - Total Potential Sites: 7 Sites (includes existing Call2Recycle e-bike battery collection sites). These sites are existing, participating collection sites – these will not be spread evenly throughout the Wards.

- Step Two: Recruitment of New Sites.
 - Audience: Recruitment and On-Boarding of non-participating sites to serve as public collection sites within Call2Recycle’s approved collection site network. The recruitment of new sites by Call2Recycle will focus on the reasonable geographic spread of sites across all eight Wards, as well as taking into account accessibility to public transit and areas where people would seek to recycle batteries. With this in mind, Call2Recycle has assembled a list of prospect sites for each Ward. Call2Recycle will outreach to a minimum of 25 potential partners with multiple collection sites to engage their interest in participating in the program. The goal for this activity will be to add a minimum of 25 new public collection sites (Target of 38 collection sites by the end of 2023).
 - Total Potential Sites: Call2Recycle will outreach to 200 potential sites.

Phase 3- timing: Quarterly, Starting January 1, 2024, to December 31, 2024

- Using Call2Recycle’s prospect list, Call2Recycle will outreach to a minimum of 25 potential public collection site partners per quarter. The goal of this activity will be to add a minimum of 12 new public collection sites per quarter.

Once the minimum collection site requirement has been met, Call2Recycle will shift to maintenance of the participating sites, with adjustments to outreach efforts and tactics as the program evolves.

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

Call2Recycle's patented collection and shipping box complies with [US EPA Universal Waste regulations](#), specifically pre-printing the required language on the box, and ships under a U.S. Department of Transportation Special Permit (*Appendix B*) allowing both rechargeable and primary batteries to be collected, stored, and shipped in the same box. In addition, each collection box comes with a reference guide for terminal protection (*Appendix C – Note: this is a sample of current program materials for rechargeable batteries. Once Call2Recycle's plan is approved, the reference guide will be updated to include mentions of all batteries.*).

In addition, damaged, defective, and recalled (DDR) lithium-based batteries require special handling per US DOT instruction and cannot be shipped in Call2Recycle’s patented collection and shipping box. Call2Recycle’s safe battery management tutorial will provide details on identifying damaged and defective batteries, as well as how to safely transport them for recycling. Public collection sites, when they open, will be supplied with a damaged and defective battery recycling kit should they encounter an individual damaged or defective battery. Recalls are the

responsibility of the obligated Original Equipment Manufacturer under their recall plan.

Any business, institution, or government entity that wishes to participate as a collection site must agree to the following:

- Provide contact information for individual sites.
- Safely handle and ship primary and rechargeable batteries in compliance with US DOT regulations and Call2Recycle program guidance.
- Complete a safety tutorial (minimum of one on-site personnel) on how to safely manage batteries, to be provided by the battery stewardship organization implementing the stewardship plan. An example of tutorial slides are found in Appendix F and at [this link](#).
- Prominently display the availability of drop-off at their location.
- Provide for the acceptance of up to 100 batteries per visit and accept all primary and rechargeable batteries regardless of type or brand.
- Ensure that collection site personnel responsible for the collection program complete the tutorial on safe battery management prior to becoming a collection site and when there is a change in responsible personnel.
- Complete and maintain proper registration with DOEE's hazardous waste generator status requirements (Note – Call2Recycle staff will provide direct technical assistance to collection sites to ensure proper submission of the District's hazardous waste generator Form 8700-12. Also, Call2Recycle will work with the District's Hazardous Waste Section to streamline the submission process from these collection sites. To comply with DC's hazardous waste regulations, sites must also annually submit a self-certification of compliance, properly label the waste (ex: Universal Waste - Batteries), manage the waste to prevent release (i.e., containerize), and demonstrate the waste has not been accumulated for more than one year. Any collection site wishing to stop participating as a collection site or that closes must notify Call2Recycle directly to ensure proper handling of any remaining batteries on-site, as well as their removal from Call2Recycle's District collection site listing.

Additionally, Call2Recycle will work to ensure D.C. Code § 8-771.03(d)(2) and (3) are met by participating public collection sites through quarterly collection sites outreach and audits.

Call2Recycle has two different classifications for participating battery collection sites - 1) Public Collection Sites and 2) Private Collection Sites. Public collection sites (i.e., retailers) provide regular collection of primary & rechargeable batteries from District consumers as outlined in the law. Private Collection Sites (i.e., hospitals) collect batteries for recycling from internal use or customers, but either do not provide regular collection or choose not to be listed as a public drop off location. Both public and private collection sites will be part of Call2Recycle's battery collection program and thus will receive collection materials at no cost.

Public Collection Sites are listed on the Call2Recycle online [locator tool](#) which includes links to their website for consumers to learn the days and hours the site is open to drop off primary and rechargeable batteries. Public collections sites must be ADA compliant to have their certificate of occupancy to be open to the public in the District. All collection sites will have Call2Recycle program materials access via downloads from the website or may request printed materials, including materials in multiple languages for informing people who have limited or no English proficiency on how to recycle their primary and rechargeable batteries at the site.

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 one collection site per 10,000 people in the District, with a reasonable geographic spread of collection sites across all 8 wards, other geographic considerations, and population as described in the law and regulations.
- Cost-effectiveness – To manage the program's cost-to-serve, Call2Recycle will consider several external factors while developing and reviewing its collection site network. For example, when considering new collection sites, Call2Recycle will review the proximity of existing collection sites to proposed new ones as it may not make sense to have two sites close to each other. Environmental health and safety – Call2Recycle will work with companies that want to enroll to promote environmental health and safety through primary and rechargeable 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 primary and rechargeable batteries, collection sites must take online training on how to accept and package used primary and rechargeable batteries properly.

All collection sites, new & existing, will be enrolled in Call2Recycle's site outreach program. Under the program, each site will receive quarterly (calendar) direct outreach from Call2Recycle staff. This outreach will be conducted each quarter (at a minimum) via phone, email or in-person, Call2Recycle staff will reach out to sites to review program requirements (i.e., requirement to hang poster, accept up to 100 batteries, etc.), shipping, safety compliance (i.e., US DOT regulations), and how the program works for them. Additionally, should a collection site ship a non-compliant box (unprotected terminals, overweight, etc.), Call2Recycle staff will contact the individual collection site at the time the receipt is processed. The site is contacted by email and/or phone to advise them of the incident, depending on the issue, the site may be suspended from receiving supplies until the appropriate training and/or other corrective action has taken place.

Call2Recycle supports its customer base by utilizing a centralized fulfillment solution that ships approximately 200,000 battery collection containers annually to 15,000 US collection sites. Call2Recycle's box fulfillment solution manages to the following standards:

- Once enrolled and training completed, new collection sites will be provided collection materials (i.e., collection boxes or drums). For sites using the collection materials, this allows the site to use one to display and fill, while having an empty back up box available once the original is filled and sent in. For sites using the bulk option, one (or two) pallet(s) of four, 55-gallon drums (space dependent) will be sent directly to the site. When all drums on a single pallet are full, the collection site will use Call2Recycle's "Battery Shipping Portal" to schedule a pick-up. The site will then place an order for additional drums (the new drums will not be delivered when the full drums are picked up – non-dedicated, "Less than truckload" shipments do not allow for delivery of one item and a pick-up of another). If the site has an additional pallet of drums, they can continue to collect batteries in those drums. If not, a Call2Recycle collection box will be provided with the original pallet shipment to ensure they can continue to collect batteries. Through experience, we do not anticipate more than a few sites using the bulk shipping option, if any at all.
- New collection sites enrollments are processed and shipped within 2 to 5 business days.

- Collection boxes are sent with a pre-paid return shipping label. Once the box is filled, it is picked up by the designated carrier.
- An automatic replenishment process for collection sites using Call2Recycle boxes ensures that participating collection sites have the necessary supplies on-hand for battery collections. Replacement orders are automatically generated when a filled collection box is shipped, and the recycling facility records the weight.
- Call2Recycle provides two boxes to all sites. Should sites need more or additional supplies (i.e., plastic bags), free supplemental orders can be requested via the Call2Recycle Customer Success team or via an online form. Unless there is an immediate need, over the last 25+ years of operating a battery collection program, collection sites have reported that they do not have additional space to store empty boxes and/or the boxes get lost if not used. Call2Recycle will work with each site to ensure they are aware of their requirements and how to request guidance or additional supplies.
- Certificates of recycling are available upon request and provide the collector with the weight of primary and rechargeable batteries recycled based on chemistry type for the requested period.

In addition to small volumes, Call2Recycle provides a free bulk shipping option for sites with large volumes of primary and rechargeable batteries to recycle. Under Call2Recycle's bulk shipping option, Call2Recycle provides UN rated 55-gallon drum "kits", which include all the materials, guidelines, and labels necessary to ensure the "kits" meet US EPA Universal Waste and US Department of Transportation regulations. Sites can schedule bulk shipments via Call2Recycle's online "Bulk Shipping Portal" which assists sites in creating a compliant Bill of Lading and allows for online scheduling of a pickup date.

Any site interested in becoming a collection partner can request more information via the online [participation inquiry](#) form or by calling toll-free 877-723-1297.

C. Accessibility & Convenience

Call2Recycle has serviced the District since 1996 with its free rechargeable battery collection and recycling program. To supplement Call2Recycle's historic collection footprint in the District, Call2Recycle will engage new collection sites as soon as the plan is approved.

As mentioned previously, once the collection site requirements of the law are achieved, Call2Recycle will shift to maintenance of the participating sites, with adjustments to outreach efforts and tactics as the program evolves. Call2Recycle will work to continually improve the program by working with DOEE staff to reassess accessibility metrics which may include a different proximity performance goal that is more applicable for the District and an at-home mail back program. In addition, Call2Recycle, along with DOEE staff, community stakeholders and possibly other Stewardship organizations will explore options for improving (battery) collection in communities that face environmental justice challenges associated with waste management.

Supplemental collection services will be evaluated for the District of Columbia in 2024. The evaluation of any service will include metrics such as initial consumer participation with an emphasis on underserved Wards, locations (for example zip codes) that show increased collection rates, battery weights returned, overall cost of the program, among other factors.

New and existing collection locations will be accessible to District consumers via Call2Recycle's online drop-off [locator](#). Call2Recycle's locator is updated daily so that only active collection sites are presented. As part of Call2Recycle's site outreach program Call2Recycle staff will conduct quarterly outreach to each participating location to review the program and ensure continued participation. Any sites that we are unable to reach after 3 attempts (in a given quarter) will be inactivated and removed from the drop-off locator.

In addition, when Call2Recycle is provided advanced notice of a sites planned closing, Call2Recycle will work with the on-site contacts to ensure that they have all the collection materials necessary to recycle any remaining batteries and removal of the on-site signage. As indicated above, Call2Recycle will conduct quarterly check-ins which in part will be used to ensure that any site that was closed without our prior knowledge has been removed from our locator and listing of actively participating sites on a daily basis.

D. Roles and Responsibilities

The program plan is based on a shared responsibility model where all parties in the battery journey 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, federal, and Provincial 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 outlined in the licenses and/or permits.

- **District Government**

Through its enforcement authority, the government is expected to enforce the Law as written.

- **Consumer or End User**

Consumers are responsible for safely recycling primary and rechargeable batteries and not disposing of them in the waste stream.

- **Collection Sites**

Whether shipping batteries via boxes or drums, collection sites must complete training on safely managing the collection container, including properly insulating terminals for specific primary and rechargeable chemistries. In addition, sites should support efforts to promote the program and how best to utilize it, based on guidance and material provided by Call2Recycle (*Note: The training materials are examples specific to Call2Recycle's national take back program and are a reference. Relevant safety materials will be updated to include mentions of all batteries.*).

- **Call2Recycle, Inc.**

Call2Recycle will develop and administer an environmentally- and economically-sound program focused on complying with the District's Law. Call2Recycle will utilize education, outreach, and promotion to influence consumer behavior.

VII. RECYCLING OF BATTERIES: TRANSPORTERS, SORTERS & PROCESSORS

A. Citations

Statutory Citation

(5) A description of how the battery stewardship organization will arrange for components of the discarded batteries to be recycled to the maximum extent economically and technically feasible, in a manner that is environmentally sound and safe for waste management workers;

Regulatory Citation

(e) A description of how the BSO will arrange for components of the discarded batteries to be recycled to the maximum extent economically and technically feasible, in a manner that is environmentally sound and safe for waste management workers, including:

- (1) The recycling process to be used for each type of battery chemistry that the BSO anticipates collecting;*
- (2) The criteria for how the BSO will evaluate the economic and technical feasibility of recycling the components of discarded batteries, and the environmental and safety records of recycling facilities that will be used to implement the plan;*
- (3) How the BSO applied the criteria in § 3902.1(e)(2) to select the recycling facilities;*
- (4) How the BSO will conduct any end-of-life handling, including management and disposal of batteries or battery components that cannot be recycled, in accordance with applicable law; and*
- (5) A description of the periodic sorting that will be used to provide the estimate required by § 3903.3(e)(4);*

B. Sorting Facilities

Primary and rechargeable batteries collected within the District will first travel to one of Call2Recycle's approved sorting partners. The primary and rechargeable batteries will be weighed, separated by battery chemistry, consolidated with similar types, and transported to a network of qualified and approved battery processors.

C. Processing Standards & Due Diligence

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 are 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 of potential vendor due diligence include:

- Annual desktop due-diligence compliance audits, including a review of OSHA Public Inspection Records, EPA Enforcement and Compliance database and OSHA 300 and 300A logs.
- Review of the facility audit performed by CHWMEG (in the past two years) or an outside auditor chosen by Call2Recycle to ensure the facility complies 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 also undergoes inspections to maintain industry-recognized certifications, like those listed below:

- **Responsible Recycling (R2):** "The R2 Standard provides a common set of criteria to recognize responsible reuse and recycling practices, all along the used portion of the electronics lifecycle. R2 Certification is the formal program for evaluating and monitoring businesses in meeting the R2 Standard, protecting the environment, the health and safety of workers, and communities, and positively impacting the movement toward a sustainable circular economy while, enriching the lives of people all around the world." (SERI <https://sustainableelectronics.org/faqs/>)
- **International Standardization Organization (ISO) 14001** "helps an organization achieve the intended outcomes of its environmental management system, which provides value for the environment, the organization itself and interested parties." (ISO <https://www.iso.org/standard/60857.html>)
- **International Standardization Organization (ISO) 45001** "Specifies requirements for an occupational health and safety (OH&S) management system, and gives guidance for its use, to enable organizations to provide safe and healthy workplaces by preventing work-related injury and ill health, as well as by proactively improving its OH&S performance." (ISO <https://www.iso.org/standard/63787.html>)
- **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.
- **Audit Summaries:** Call2Recycle continuously monitors and evaluates the efficiency and quality of its downstream vendor's reclamation process and 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 primary and rechargeable batteries that want assurance that their primary and rechargeable batteries are properly disposed. All consolidation, sorting, and processing facilities are open to inspection and audit. Call2Recycle, Inc. may employ other sorting facilities in the future as appropriate at its sole discretion. If any transporter or processor (including sorter) is changed, in line with 20 DCMR 3902.6, Call2Recycle "shall notify DOEE within thirty (30) days" of the change. Full audit summaries for approved sorters and/or processors handling the District Program's in-scope batteries are available upon request.
- **Call2Recycle R2 Certification:** Call2Recycle receives Responsible Recycling (R2) certification (*Appendix D*) 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.

Downstream Vendor Selection Documents: Call2Recycle has the following downstream vendor selection control policies that may be provided upon request:

- *Downstream Vendor Selection Program (WORK7.01.01 Downstream Vendor & Carrier*

Selection Program)

- *Downstream Vendor Questionnaire (FORM 07.01.01-R2 Downstream Vendor Questionnaire), and R2 Desk Audit Checklist (FORM07.01.03-R2 DSV Audit Checklist).*

Call2Recycle conducts due diligence on processors, per the SERI R2v3 standard. When considering a company that has EPA violations, Call2Recycle follows its best practices to make informed decisions. The organization begins by thoroughly understanding the nature and severity of the violations and assessing the processor's response, including corrective actions and improvements in compliance procedures. Call2Recycle reviews the processor's overall compliance history and any past enforcement actions. Finally, the organization conducts a desktop audit to evaluate whether any action should be taken regarding continued inclusion in the Call2Recycle processing network. Downstream vendor selection and evaluation criteria include:

- a. Evidence that Downstream Vendor adheres to a documented system to manage environmental, health, and safety risks and legal requirements.
 - b. Evaluation of certifications including ISO 9001, ISO 45001, ISO 14001, RIOS and/or R2
 - c. Evidence that Downstream Vendor demonstrates knowledge of and has taken measures to comply with all applicable environmental, health and safety legal requirements as identified in its compliance plan.
 - d. Evidence that Downstream Vendor maintains a current list of its permits and copies of each.
 - e. Evidence that Downstream Vendor conducts on a regular basis (e.g., as new types of materials are processed, or new processes or equipment are used) a hazards identification and assessment of occupational health and safety, and environmental risks that exist or could reasonably be expected to develop at the facility.
 - f. Evidence that Downstream Vendor meets all applicable regulatory requirements to receive material, and that use technology designed and operated to safely and effectively manage the material.
 - g. Evaluation of EPA Environmental Compliance History Online (ECHO) Detailed Facility Reports, Compliance Status and Findings.
 - h. Data sanitization and data security measures, as applicable for Downstream Vendors that handle or receive data bearing devices.
- **Solid or Hazardous Waste Registration or Permits:** A list of all applicable solid or hazardous waste permits is available upon request. The need for permitting is highly dependent on the specific process each downstream vendor uses to process waste primary and rechargeable batteries. As such, not all permits for all downstream vendors will be the same.

It is important to note that some of the recycling processes for battery recycling produce non-hazardous waste byproducts, namely non-hazardous, non-recyclable mixed solid waste plastics. These materials are disposed of by Call2Recycle Downstream Vendors in accordance with applicable state and federal law.

D. Primary Battery Processors

Below is a listing of all processors and their attributes used to process batteries generated in the District. Below please find a description of each processor.

(1) Non-lithium Processors

Processor	Address
Cirba Solutions Recovery	4930 Holtz Dr, Wixom, MI 48393

Cirba Solutions was selected as a processor for Call2Recycle based on the following qualifications:

- **Recycling Efficiency Rate (RER):** Cirba Solutions has a self-reported RER of 97.98%, which exceeds INMETCO’s 85% RER. Cirba Solutions 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, both facilities exceed it.
- **Efficiency & Cost:** With Cirba Solutions 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, Cirba Solutions provides further efficiency as it is the only facility with optical sorting capabilities. Batteries collected in the District will continue to be shipped directly to Cirba Solutions where they will be recorded by site, sorted by chemistry, consolidated into truckload shipments, and sent, if applicable, to Call2Recycle’s qualified processing network.
- **Process Description:** Non-lithium primary batteries will be processed by Cirba Solutions 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 Cirba Solutions to manufacturers to be used as feedstock to make new materials. Most notably, Zinc and Manganese concentrate, is combined with other materials to ultimately manufacture a granular fertilizer. Cirba Solutions does not manufacture the final end product of granular fertilizer.

Processor	Address
International Metals Reclamation Company (INMETCO)	One INMETCO Drive, Ellwood City, PA 16117

The International Metals Reclamation Company (INMETCO) 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.
- **Process Description:** Non-lithium primary batteries will be processed by INMETCO at a high temperature metals recovery (“HTMR”) facility. HTMR is a process used to recover nickel, chromium, and iron from metal bearing waste streams. Using an electric arc furnace melting

process, impurities contained in the scrap metal are driven from the molten steel in the form of a flue dust that is captured and controlled by emission control baghouses. When used for the process of recycling non-lithium primary batteries, INMETCO recovers steel, brass and manganese. Zinc is captured in baghouse dust. This material is then sent for further processing where the zinc is captured and recovered.

(2) Lithium Processors

Processor	Address
Redwood Materials	2801 Lockheed Way Carson City, NV 89706

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.
- **Process Description:** Lithium primary batteries are processed at Redwood Materials using a multi-step process. Batteries are thermally pre-processed in an oxygen starved environment for discharging and electrolyte capture. It is important to note that this process is energy-neutral and not the same as high-temperature smelting processes used in pyrometallurgy. Discharged batteries are then size reduced via shredding. Steel battery casings are mechanically separated. The remaining material, including lithium, zinc and manganese can then be subject to hydrometallurgical metal separation capabilities that Redwood is actively developing.

Processor	Address
Cirba Solutions	9384 BC-22A, Trail, BC V1R 4W6, Canada

Cirba Solutions, 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. Cirba Solutions is one of two battery recycling processors in North America who actively accepts lithium primary batteries for recycling and materials recovery. The addition of Cirba Solutions as a processor for Call2Recycle was based on the following qualifications:

- **Recycling Efficiency Rate (RER):** Cirba Solutions has a self-reported RER of 56.4%, which exceeds

the prevailing global standard of 50%, as decreed by the European Union (EU).

- **Efficiency & Cost:** With Cirba Solutions 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 additional approved processors.
- **Process Description:** Lithium primary batteries processed by Cirba Solutions 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 and are used as feedstock to produce new materials.

E. Rechargeable Battery Processors

To optimize efficiency, reclaim the maximum amount of material for secondary use, and to ensure processors have the capacity to handle batteries sent to them, Call2Recycle has built a global network of world-class processors. Below is a listing of rechargeable battery processors, organized by the chemistry they process.

(1) Lithium Ion (Li-Ion) Processors

Processor	Address
Recycling Coordinators, Inc. (RCI)	600 E. Exchange St. Akron, OH 44306

Recycling Coordinators Inc., (RCI), located in Akron Ohio, processes all types of metal bearing by-products that contain concentrations of nickel, cobalt, copper, chrome, molybdenum, tungsten and titanium. Through full product stewardship, Recycling Coordinators will wholly consume each industrial by-product to maximize an environmental outcome. RCI was selected as a processor for Call2Recycle based on the following qualifications:

- **Recycling Efficiency Rate (RER):** RCI’s recycling efficiency rates consistently exceed the prevailing global standard of 50%, as decreed by the European Union (EU).
- **Efficiency & Flexibility:** RCI is located in northeast Ohio, in close proximity to major US population centers and to one of Call2Recycle’s primary sorting partners (Cirba Solutions) in Wixom, MI, reducing the environmental impact of transporting batteries from sorter to processor. Additionally, RCI is able to process both lithium-ion and Ni-MH batteries.
- **Process Description:** Lithium-ion batteries will be processed by RCI using a room temperature, mechanical separation process where the battery components are separated into three end products: 1) Black mass, containing nickel, cobalt, manganese, lithium, and graphite, 2) steel, and 3) mixed Aluminum Copper and plastics. The three end products are used as feedstock to produce new materials.

Processor	Address
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Li-Cycle	1669 Lake Avenue, Building 350 Eastman Business Park Rochester, NY 14615
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Li-Cycle is a clean technology company with technology for resource recovery of end-of-life lithium-ion batteries. Li-Cycle Technology™ is a closed loop, economically viable, safe and sustainable process that can recover 80 – 100% of all materials in lithium-ion batteries. Li-Cycle’s mission is to provide sustainable and safe customer-centric solutions for end-of-lifecycle lithium ion batteries while meeting the rapidly growing demand for critical battery material. Li-Cycle was selected as a processor for Call2Recycle based on the following qualifications:

- **Recycling Efficiency Rate (RER):** Li-Cycle’s recycling efficiency rates consistently exceed the prevailing global standard of 50%, as decreed by the European Union (EU).
- **Efficiency & Flexibility:** Li-Cycle is located in upstate New York, in close proximity to major US population centers. Additionally, Li-Cycle has spokes in Gilbert, AZ and North Port, AL; these facilities will not receive District batteries, but Li-Cycle’s multi-facility footprint offers Call2Recycle the ability to minimize program-wide environmental impact. Li-Cycle is also currently developing hydrometallurgical metal recovery capability at their Hub in Rochester, NY.
- **Process Description:** Lithium-ion batteries will be processed by Li-Cycle using a room temperature, mechanical separation process where the battery components are separated into four end products: 1) Separator plastic; 2) Aluminum and Copper from cathode and anode foil; 3) black mass, containing nickel, cobalt, manganese, lithium, and graphite, and 4) steel. The four end products are then sent to downstream processors for further refinement and separation.

Processor	Address
Interco	10 Fox Industrial Dr. Madison, IL 62060

Interco was selected as a processor for Call2Recycle based on the following qualifications:

- **Recycling Efficiency Rate (RER):** Interco’s recycling efficiency rates consistently exceed the prevailing global standard of 50%, as decreed by the European Union (EU).
- **Efficiency & Flexibility:** Interco is centrally located in Maddison, IL, in close proximity to major US population centers. Additionally, Interco is able to process both lithium-ion and Ni-MH batteries. Interco is also currently developing hydrometallurgical metal recovery capability at a facility in Fredericktown, MO.
- **Process Description:** Lithium-ion batteries will be processed by Interco using a room temperature, mechanical separation process where the battery components are separated into four end products: 1) Separator plastic; 2) Aluminum and Copper from cathode and anode foil; 3) black mass, containing nickel, cobalt, manganese, lithium and graphite, and 4) steel. The four end products are then sent to downstream processors for further refinement and separation.

Processor	Address
Redwood Materials	2401 Conestoga Drive Carson City, NV 89706

Redwood Materials, Inc. (Redwood) operates a facility that reprocesses batteries into final product and commodities. Redwood processes lithium-ion 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.
- **Process Description:** Lithium-Ion batteries are processed at Redwood Materials using a multi-step process. Batteries are thermally pre-processed in an oxygen starved environment for discharging and electrolyte capture. It is important to note that this process is energy-neutral and not the same as high-temperature smelting processes used in pyrometallurgy. Discharged batteries are then size reduced via shredding. Shredded material is then subject to mechanical separation process where the battery components are separated into four end products: 1) Separator plastic; 2) Aluminum and Copper from cathode and anode foil; 3) black mass, containing nickel, cobalt, manganese, lithium and graphite, and 4) steel. The four end products are then sent to downstream processors for further refinement and separation.

(2) Nickel Metal Hydride (NiMH) Processors

Processor	Address
International Metals Reclamation Company (INMETCO)	One INMETCO Drive, Ellwood City, PA 16117

The International Metals Reclamation Company (INMETCO) 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 recycling efficiency rates consistently exceed the prevailing global standard of 50%, as decreed by the European Union (EU).
- **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.
- **Process Description:** Ni-MH batteries will be processed by INMETCO at a high temperature metals recovery ("HTMR") facility. HTMR is a process used to recover nickel, chromium, and iron from metal bearing waste streams. Using an electric arc furnace melting process, impurities contained

in the scrap metal are driven from the molten steel in the form of a flue dust that is captured and controlled by emission control baghouses. When used for the process of recycling Ni-MH batteries, INMETCO recovers steel and nickel.

Processor	Address
Recycling Coordinators, Inc. (RCI)	600 E. Exchange St. Akron, OH 44306

Recycling Coordinators Inc., (RCI), located in Akron Ohio, processes all types of metal bearing by-products that contain concentrations of nickel, cobalt, copper, chrome, molybdenum, tungsten, and titanium. Through full product stewardship, Recycling Coordinators will wholly consume each industrial by-product to maximize an environmental outcome.

RCI was selected as a processor for Call2Recycle based on the following qualifications:

- **Recycling Efficiency Rate (RER):** RCI’s recycling efficiency rates consistently exceed the prevailing global standard of 50%, as decreed by the European Union (EU).
- **Efficiency & Flexibility:** RCI is located in northeast Ohio, in close proximity to major US population centers and to one of Call2Recycle’s primary sorting partners (Cirba Solutions) in Wixom, MI, reducing the environmental impact of transporting batteries from sorter to processor. Additionally, RCI is able to process both lithium-ion and Ni-MH batteries.
- **Process Description:** Ni-MH batteries will be processed by RCI using a room temperature, mechanical separation process where the battery components are size reduced via shredding. This battery shred is then sent to a downstream smelter for recovery of nickel and steel. A waste stream of non-hazardous solid waste non-recyclable mixed plastics is also generated. The four end products are then sent to downstream processors for further refinement and separation.

Processor	Address
Interco	10 Fox Industrial Dr. Madison, IL 62060

Interco was selected as a processor for Call2Recycle based on the following qualifications:

- **Recycling Efficiency Rate (RER):** Interco’s recycling efficiency rates consistently exceed the prevailing global standard of 50%, as decreed by the European Union (EU).
- **Efficiency & Flexibility:** Interco is centrally located in Maddison, IL, in close proximity to major US population centers. Additionally, Interco can process both lithium-ion and Ni-MH batteries. Interco is also currently developing hydrometallurgical metal recovery capability at a facility in Fredericktown, MO.
- **Process Description:** Ni-MH batteries will be processed by Interco using a room temperature, mechanical separation process where the battery components are size reduced via shredding. This battery shred is then sent to a downstream smelter for recovery of nickel and steel and are used as feedstock to produce new materials.

Processor	Address
Redwood Materials	2401 Conestoga Drive Carson City, NV 89706

Redwood Materials, Inc. (Redwood) operates a facility that reprocesses batteries into final product and commodities. Redwood processes 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.
- **Process Description:** Ni-MH batteries are processed at Redwood Materials using a multi-step process. Batteries are thermally pre-processed in an oxygen starved environment for discharging and electrolyte capture. It is important to note that this process is energy-neutral and not the same as high-temperature smelting processes used in pyrometallurgy. Discharged batteries are then size reduced via shredding. This battery shred is then sent to a downstream smelter for recovery of nickel and steel. Redwood Materials is actively developing hydrometallurgical metal separation capability.

Processor	Address
Evergreen Battery Recycling, LLC	2250 Larchmont Avenue Warren, OH 44483

Evergreen Battery Recycling. (EBR) operates a facility that processes Ni-MH and Ni-Cd batteries. EBR is an approved processor for Call2Recycle based on the following qualifications:

- **Recycling Efficiency Rate (RER):** EBR’s recycling efficiency rates consistently exceed the prevailing global standard of 50%, as decreed by the European Union (EU).
- **Efficiency and Flexibility:** EBR processes both Ni-Cd and Ni-MH batteries and provides the material that they recover back into the domestic manufacturing market.
- **Process Description:** Ni-MH batteries will be processed by EBR using a room temperature, mechanical separation process where the battery components are size reduced via shredding. This battery shred is then sent to a downstream smelter for recovery of nickel and steel. A waste stream of non-hazardous solid waste non-recyclable mixed plastics is also generated. This material is not recyclable and cannot be used as feedstock to produce new materials. It has been verified as non-hazardous through Toxic Characteristic Leaching Procedure (TCLP) analysis and is disposed of in a local non-hazardous landfill in accordance with federal and Ohio state law.

(3) Nickel Cadmium (Ni-Cd) Processors

Processor	Address
Evergreen Battery Recycling, LLC	2250 Larchmont Avenue Warren, OH 44483

Evergreen Battery Recycling. (EBR) operates a facility that processes Ni-MH and Ni-Cd batteries.

EBR is currently one of two battery recycling processors in North America who actively accepts nickel cadmium batteries for recycling and materials recovery and handles them in compliance with the Basel Treaty. EBR is an approved processor for Call2Recycle based on the following qualifications:

- **Recycling Efficiency Rate (RER):** EBR’s recycling efficiency rates consistently exceed the prevailing global standard of 75%, as decreed by the European Union (EU).
- **Efficiency and Flexibility:** EBR processes both Ni-Cd and Ni-MH batteries and provides the material that they recover back into the domestic manufacturing market. Cadmium metal recovered by EBR is sold directly into the domestic battery manufacturing supply chain.
- **Process Description:** Ni-CD batteries will be processed by EBR using a room temperature, mechanical separation process where the battery cells are separated from plastic casings. Battery cells are then subject to a retort process where high-purity cadmium is extracted for sale into the domestic battery supply chain. The remaining nickel-rich material is sent to a downstream smelter for recovery of nickel and steel. A waste stream of non-hazardous solid waste non-recyclable mixed plastics is also generated. This material is not recyclable and cannot be used as feedstock to produce new materials. It has been verified as non-hazardous through Toxic Characteristic Leaching Procedure (TCLP) analysis and is disposed of in a local non-hazardous landfill in accordance with federal and Ohio state law.

Processor	Address
Cirba Solutions	265 Quarry Rd SE Lancaster, OH 43130-8271

Cirba Solutions, located in Lancaster, Ohio, has been a leader in battery recycling and management for 25 years, including client services, research and development, environmental compliance, and recycling best practices. Cirba Solutions is currently one of two battery recycling processor in North America who actively accepts nickel cadmium batteries for recycling and materials recovery and handles them in compliance with the Basel Treaty. The addition of Cirba Solutions as a processor for Call2Recycle was based on the following qualifications:

- **Recycling Efficiency Rate (RER):** Cirba Solutions has a self-reported RER of 56.4%, which exceed the prevailing global standard of 75%, as decreed by the European Union (EU).
- **Efficiency & Cost:** With Cirba Solutions being located in North America, utilizing them as a processor for nickel cadmium batteries, Call2Recycle is able to achieve greater cost savings and efficiency measures, as a result of not having to transport these batteries to an approved processor.
- **Process Description:** Ni-CD batteries will be processed by Cirba using a room temperature, mechanical separation process where the battery cells are separated from plastic casings. Battery cells are then subject to a retort process where high-purity cadmium is extracted for sale into the domestic battery supply chain. The remaining nickel-rich material is sent to a downstream smelter for recovery of nickel and steel and is used as feedstock to produce new materials. A waste stream of hazardous waste non-recyclable mixed plastics is also generated. This material is disposed of in a hazardous waste landfill in accordance with federal and Ohio state law. Cirba is an Ohio state permitted RCRA Subpart B Treatment Storage and Disposal Facility (TSDF).

(4) Small Sealed Lead Acid (SSLA) Processors

Processor	Address
Gopher Resources	685 Yankee Doodle Road Eagan, MN 55121

Gopher Resource has been a national environmental solutions provider for 75 years, protecting the earth and preserving natural resources. Its purpose is the safe and efficient recycling of lead batteries throughout North America using sustainable practices and advanced technology. Call2Recycle uses Gopher to handle small sealed lead acid (SSLA) battery recycling.

- **Recycling Efficiency Rate (RER):** Gopher Resources’ recycling efficiency rates consistently exceed the prevailing global standard of 65%, as decreed by the European Union (EU).
- **Efficiency and Flexibility:** Gopher Resources processes SSLA batteries and provides the material that they recover back into the domestic manufacturing market.
- **Process Description:** Lead acid batteries are one of the most commonly recycled types of batteries due to their high lead content, which can be reclaimed and reused in the production of new batteries. The process of recycling lead acid batteries involves the following steps:
 - Battery breaking: At the recycling facility, the lead acid batteries are broken down into smaller pieces, either manually or mechanically. This process involves removing the outer plastic casing and separating the different components of the battery, including the lead plates, acid, and plastic separators.
 - Battery crushing: The lead plates, along with the plastic separators, are crushed to further break them down into smaller particles. This allows for easier separation of the lead from the other materials.
 - Separation of materials: The crushed materials are then submerged in water to create a slurry, which is then passed through a series of screens and filters to separate the lead from other materials, such as plastic and acid. The lead sinks to the bottom due to its higher density, while the plastic and acid are separated and treated separately.
 - Lead smelting: The lead recovered from the battery breaking and separation process is typically sent to a lead smelter, where it is melted down and refined to remove impurities. The purified lead can then be used as a raw material in the production of new lead acid batteries or other products.
 - Treatment of acid: The acid separated during the recycling process is usually neutralized and treated to remove impurities. This may involve adding chemicals to neutralize the acid and then treating it to remove heavy metals and other contaminants before it is discharged or reused.
 - Plastic recycling: The plastic separators and outer casings of the lead acid batteries are recycled. They are washed, shredded, and melted down to produce plastic pellets that can be used in the manufacturing of various plastic products.
 - Recycling of other components: Other components of lead acid batteries, such as electrolyte and other metals like copper, are recovered and recycled or properly disposed of according to applicable regulations and as outlined below.
 - Electrolyte is used in upfront crushed battery feed desulfurization process, or captured and stored for use in the waste water treatment plant to adjust pH throughout the wastewater treatment process.
 - Copper/non-lead metals are captured within the final lead product, unrecoverable amounts go out to the appropriate landfill in the form of

- furnace slag pending TCLP results (e.g., haz-waste landfill or non-haz landfill).
- Plastic from the inbound battery cases is washed, separated, and recycled in the plastics recycling operation. Plastic is recycled into pellets which are largely sold back into the battery manufacturing industry and other lead based industries (ammunition manufacturers). A small amount of non-recyclable plastic goes to our furnaces where residual amounts of lead on/within the plastic is recovered in the smelting process.

Processor	Address
Doe Run Co	18594 State Hwy KK, Boss, MO 65440

The Doe Run Company is a mining and metal production company based in St. Louis, Missouri, United States. It is one of the world's largest integrated producers of lead metal and lead alloys, as well as a significant producer of other metals, such as zinc, copper, and silver. The company has operations in the United States, including mines, mills, and smelters. Doe Run operates multiple mining and metal production facilities, including underground and surface mines, mills, and smelters, and it is known for its expertise in the production of lead metal and lead-based alloys.

- **Recycling Efficiency Rate (RER):** Doe Run’s recycling efficiency rates consistently exceed the prevailing global standard of 65%, as decreed by the European Union (EU).
- **Efficiency and Flexibility:** Doe Run processes SSLA batteries and provides the material that they recover back into the domestic manufacturing market.
- **Process Description:** Lead acid batteries are one of the most commonly recycled types of batteries due to their high lead content, which can be reclaimed and reused in the production of new batteries. The process of recycling lead acid batteries involves the following steps:
 - Battery breaking: At the recycling facility, the lead acid batteries are broken down into smaller pieces, either manually or mechanically. This process involves removing the outer plastic casing and separating the different components of the battery, including the lead plates, acid, and plastic separators.
 - Battery crushing: The lead plates, along with the plastic separators, are crushed to further break them down into smaller particles. This allows for easier separation of the lead from the other materials.
 - Separation of materials: The crushed materials are then submerged in water to create a slurry, which is then passed through a series of screens and filters to separate the lead from other materials, such as plastic and acid. The lead sinks to the bottom due to its higher density, while the plastic and acid are separated and treated separately.
 - Lead smelting: The lead recovered from the battery breaking and separation process is typically sent to a lead smelter, where it is melted down and refined to remove impurities. The purified lead can then be used as a raw material in the production of new lead acid batteries or other products.
 - Treatment of acid: The acid separated during the recycling process is usually neutralized and treated to remove impurities. This may involve adding chemicals to neutralize the acid and then treating it to remove heavy metals and other contaminants before it is discharged or reused.

- Plastic recycling: The plastic separators and outer casings of the lead acid batteries are recycled. They are washed, shredded, and melted down to produce plastic pellets that can be used in the manufacturing of various plastic products.
- Recycling of other components: Electrolyte is refined and sold for the manufacture of new batteries. Copper is sold as a commodity to copper smelters.

F. Safety and Compliance

Call2Recycle works closely with federal, state, and provincial environmental protection agencies and the U.S. Department of Transportation (USDOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) to ensure the 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 battery collection boxes. This patented innovation offers an additional layer of protection in preventing 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.

Call2Recycle's program is designed to capture information and documentation necessary to track and report on all shipments 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 the final destruction of materials collected by the program.

An independent CPA firm audits Call2Recycle's financial statements 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.

G. Training

Call2Recycle works closely with the USDOT and PHMSA to ensure the safe collection, transportation, and recycling of primary and rechargeable batteries. It provides necessary safety training and educational materials to collect and ship batteries for recycling.

Educating and training collection sites on safe and compliant handling and shipping of primary and rechargeable batteries begins when new sites are enrolled. Prior to Call2Recycle providing collection boxes, all new sites are required to complete an online safety training course successfully. Once completed, the site is activated, and Call2Recycle will then ship the site boxes so they can start collecting primary and rechargeable batteries.

Call2Recycle's 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.

The training module includes guidelines for using Call2Recycle's [collection boxes](#). These boxes are pre-labeled for [US DOT Special Permit 14849](#) (See Appendix B), which 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 offers safety resources on its District-specific webpage, www.call2recycle.org/DC. Resources include battery recycling awareness posters, bulk shipping safety guidelines, box terminal protection guidelines, and answers to frequently asked questions.

H. Periodic Sorting

As part of its normal process, Call2Recycle will sample primary and rechargeable batteries generated by the District collection sites to determine if any are orphaned primary and rechargeable batteries (originating from brands that are no longer in business) or "free-riders" primary and rechargeable batteries (originating from brands not participating in the Call2Recycle program) that have ended up in Call2Recycle's waste stream. Call2Recycle closely tracks and monitors these occurrences. Additionally, Call2Recycle will routinely monitor battery sales in the District at various retail locations to validate that obligated battery producers are participating in an approved plan.

Audit selection is random; however, starting in 2023, a sampling of collection boxes shipped from District collectors will be pulled and staged over a specified period (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

On an annual basis, Call2Recycle will provide a report to the District on ongoing monitoring activities, seeking enforcement assistance, and, if collection performance goals are met, advising on potential reimbursement actions as appropriate.

VIII. PLAN PARTICIPANTS

A. Citations

Statutory Citation

(6) A list of all key participants in the battery collection program, including:

(A) The names of the collection sites accepting batteries under the plan, including the address and contact information for each collection site;

(B) The name and contact information of a transporter or contractor collecting batteries from the collection sites; and

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

Regulatory Citation

- (f) A list of all key participants in the battery collection program, including:
 - (1) For each collection site accepting batteries under the plan:
 - (A) Site name;
 - (B) Physical address of the site;
 - (C) Phone number of the site; and
 - (D) If available, the name and email address of a contact person at the site and the website for the site or parent company;
 - (2) For each transporter or contractor collecting batteries from the collection sites:
 - (A) Company name;
 - (B) Name of a contact person;
 - (C) Physical address of the company;
 - (D) Email address and phone number for the contact person; and
 - (E) Company website, if available;
 - (3) For any facility that processes the collected batteries or components of the collected batteries, including recycling facilities or any end-of-life handling facilities:
 - (A) Company name;
 - (B) Physical address of the facility;
 - (C) Name of a contact person;
 - (D) Email address and phone number for the contact person;
 - (E) A summary of the facility's role in processing the collected batteries or components of the collected batteries;
 - (F) The environmental compliance summary specified in § 3902.2;
 - (G) Company website, if available; and
 - (H) A list of all solid or hazardous waste registrations or permits applicable to the facility that pertain to the processing of batteries or components of batteries at the facility's location; and

B. Collection Sites

The below table lists all active public Call2Recycle collection locations in the District of Columbia.

Location Name	Open Days & Hours	Address	City/Zip	Phone
Adams Morgan Ace Hardware	Mon- Sat – 8:00 AM – 8:00 PM Sun. 10:00 AM – 6:00 PM	1704 Columbia Rd NW	Washington, DC 20009-2804	tel:202-299-0040
Lowe's	Mon- Sat – 6:00 AM – 10:00 PM Sun. 8:00 AM – 8:00 PM	2438 Market St NE	Washington, DC 20018	tel:202-378-2500
Tenleytown Ace Hardware	Mon- Sat – 8:00 AM – 8:00 PM Sun. 10:00 AM – 6:00 PM	4500 Wisconsin Ave NW	Washington, DC 20016-4628	tel:202-364-1902
The Home Depot	Mon- Sat – 6:00 AM – 10:00 PM Sun. 7:00 AM – 8:00 PM	901 Rhode Island Ave NE	Washington, DC 20018-1733	tel:202-526-8760

True Value on 17th	Mon- Fri – 8:00 AM – 6:00 PM Sat. 9:00 AM – 6:00 PM Sun. 10:00 AM – 6:00 PM	1623 17th St NW	Washington, DC 20009-2433	tel:202-462-3146
Asurion Tech Repair & Solutions - Eastern Market (uBreakiFix)	Mon- Sat – 10:00 AM – 7:00 PM Sun. 12:00 PM – 5:00 PM	425 8th St SE	Washington, DC 20003	tel: 202-987-6342

The below table lists all active private Call2Recycle collection locations in the District of Columbia. Private collection site locations are those businesses that chose to not be listed on the Call2Recycle locator and are not open to the public as a battery collection location.





Location Name	Address	City/Zip
All Souls Church	1500 Harvard St NW	Washington DC, 20009
Amazon Fresh - Malone	1733 14th St NW	Washington DC, 20009
American University	4400 Massachusetts Ave. NW	Washington DC, 20016
Ankura	2000 K St NW Ste 1200	Washington DC, 20006
Annie's Ace Hardware - Brookland	3405 8th St NE	Washington DC, 20017
Apple Carnegie Library	801 K Street NW	Washington DC, 20001
Apple Store Georgetown	1229 Wisconsin Ave NW	Washington DC, 20007
Audacy Inc.	1015 HALF STREET SE	Washington DC, 20003
Authentic8	1000 Vermont Ave NW	Washington DC, 20005
Bain and Company	1717 K St NW Ste 1100	Washington DC, 20006
Bain and Company	1101 16th St NW, Suite 700	Washington DC, 20036
Bell Media	1717 Desales St NW	Washington DC, 20036
Best Buy	3100 14th St NW	Washington DC, 20010
B'nai B'rith Youth Org	800 8th Street NW	Washington DC, 20001
Bombardier USA	2200 Pennsylvania Ave NW	Washington DC, 20037
Boys & Girls Clubs of Greater Washington	4103 Benning Road NE	Washington DC, 20019
Bureau of ATF Parent	650 Massachusetts Ave NW # D	Washington DC, 20226
Canadian Broadcasting Co	529 14th St NW	Washington DC, 20045
Christ House	1717 Columbia Rd NW	Washington DC, 20009
Comcast -Washington, DC	1110 Vermont Ave NW	Washington DC, 20005
Communications Center (SHE)	345 Murray Lane Bldg T5	Washington DC, 20223
DC Bar	901 4th St NW	Washington DC, 20001

Department of Energy & Environment Government of the District of Columbia	1200 First Street NE, 5th Floor	Washington DC, 20002
Dept. of Homeland Security (DHS)	12th & C St SW	Washington DC, 20024
DHS/USSS	245 Murray Ln SW	Washington DC, 20223
Engenium Group	1017 O St NW	Washington DC, 20001
EvalMundi LLC	1302 Bryant St NE	Washington DC, 20018
FDD	1800 M St NW	Washington DC, 20036
Federal Bureau of Investigation	935 Pennsylvania Ave NW	Washington DC, 20535
Golden Triangle BID	1120 Connecticut Ave NW Ste 260	Washington DC, 20036
JLL	1801 K Street	Washington DC, 20006
Joint Base Anacostia Bolling	121 Dia Access Rd SW Bldg 421	Washington DC, 20373
Land Trust Alliance	1250 H St. NW Ste 600	Washington DC, 20002
Library of Congress	101 Independence Ave SE	Washington DC, 20540
MedStar Georgetown University Hospital	3800 Reservoir Road, NW	Washington DC, 20007
MedStar National Rehabilitation Hospital	102 Irving St. NW	Washington DC, 20010
MedStar Washington Hospital Center	110 Irving St NW	Washington DC, 20010
National Association of Manufacturers	733 10TH ST NW STE 700	Washington DC, 20001
National Library Service for the Blind & Physically Disabled	1291 Taylor St NW	Washington DC, 20542
Naval Research Laboratory	4555 Overlook Ave SW	Washington DC, 20375
Office of Finance and Logistics	400 Maryland Ave., SW	Washington DC, 20202
Palisades Montessori	5104 MACARTHUR BLVD NW	Washington DC, 20016
Philips Healthcare	1050 K St NW	Washington DC, 20001
Polinger LLC	1200 1ST ST NE	Washington DC, 20002
Quadrangle	1001 G ST NW STE 900	Washington DC, 20001
RAI Services Company	1201 F St NW	Washington DC, 20004
SIGTARP	1801 L St NW	Washington DC, 20036
Simpson, Gumpertz & Heger	1625 I St NW	Washington DC, 20006
T&R Productions, LLC	1325 G St NW	Washington DC, 20005
The Management Center	1920 L St NW	Washington DC, 20036
Thomson Reuters	1333 H St NW	Washington DC, 20005
U.S. Secret Service	245 Murray Ln SW	Washington DC, 20223
U.S. Secret Service	950 H St NW Ste 6100	Washington DC, 20223
uBreakiFix	3510 Connecticut Ave NW	Washington DC, 20008
UPCEA	1 DuPont Cir NW	Washington DC, 20036
US Conference of Mayors	1620 I Street NW	Washington DC, 20006
US Department of State	2201 C St NW Rm B2A51	Washington DC, 20520
US Dept of State	2401 E St NW	Washington DC, 20037

US Government Printing Office	732 N Capitol St NW	Washington DC, 20401
USA for UNHCR	1310 L St NW Ste 450	Washington DC, 20005
USCCB	3211 4th St NE	Washington DC, 20017
USDA Forest Service Parent	201 14th St SW	Washington DC, 20250
Wegmans	41 Ridge Square NW	Washington DC, 20016
Wiley Rein LLP	2050M St. NW	Washington DC, 20006
WUSA-TV9	4100 Wisconsin Ave NW	Washington DC, 20016

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 District collection sites to sorters using the same carriers. Call2Recycle's contracted bulk transporters are FedEx Freight & C.H. Robinson. 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
	UPS Danielle Simerly dsimerly@ups.com 678-428-4924 215 Marvin Miller Dr. Atlanta, GA 30336 www.ups.com
	FedEx Ground Laura Shickle lrshickle@fedex.com 678-201-7539 1675 Airport Rd. NW Kennesaw, GA 30144 www.fedex.com
	FedEx Freight Laura Shickle lrshickle@fedex.com 678-201-7539 1675 Airport Rd. NW Kennesaw, GA 30144 www.fedex.com
	FreightQuote Ian Snitz ian.snitz@freightquote.com 14701 Charlson Road, Eden Prairie, MN 555347-5076 816.949.6376 www.chrobinson.com

D. Sorters

Primary and rechargeable batteries collected within the District will first travel to one of Call2Recycle's approved sorting partners. The primary and rechargeable batteries will be weighed, separated by battery chemistry, consolidated with similar types, and transported to a network of qualified and approved battery processors.

Sorter	Address	Contact
Wistron Greentech	2101 Couch Dr. McKinney, TX 75069	Renee Duncan PH: 972-510-8486 Email: Renee.duncan@wistron.com https://greentech.wistron.com
Cirba Solutions	618 E. Auto Center Drive, Suite 111 Mesa, AZ 85204	Stephanie Dix Ph: 248.446.5626 Email: sdix@cirbasolutions.com www.cirbasolutions.com
Cirba Solutions	4930 Holtz Dr, Wixom, MI 48393	Stephanie Dix Ph: 248.446.5626 Email: sdix@cirbasolutions.com www.cirbasolutions.com
Electronic Recyclers International (ERI)	7815 N. Palm Avenue, Suite 140 Fresno, CA 93711	Angie Ransom Ph: 559-974-8586 Email: angie.ransom@eridirect.com <u>ERI - Electronic Recycling & IT Asset Disposition (ITAD) Services (eridirect.com)</u>
Electronic Recyclers International (ERI)	3100 Reeves Road Plainfield, IN 46168	Angie Ransom Ph: 559-974-8586 Email: angie.ransom@eridirect.com <u>ERI - Electronic Recycling & IT Asset Disposition (ITAD) Services (eridirect.com)</u>
Alliance Fulfillment	913 Cobb Pkwy North Marietta, GA 30062	David Evans PH: 678-613-1201 Email: dave@alliancefulfillment.com <u>Home - (alliancefulfillment.com)</u>

E. Processors

The summary of each facilities role in processing and collecting batteries is found above in Section VII D) and E).

Processor	Materials Processed	Processing Facility Address	Contact and Phone Number
Cirba Solutions Recovery	Non-Lithium Primary	4930 Holtz Dr, Wixom, MI 48393	Stephanie Dix Ph: 248.446.5626 Email: sdix@cirbasolutions.com www.cirbasolutions.com
Cirba Solutions	Lithium Primary	9384 BC-22A, Trail, BC V1R	Jeyanth Robertson Ph: 250-367-9882

		4W6, Canada	Email: jroberston@cirbasolutions.com www.cirbasolutions.com
Cirba Solutions	Ni-CD	265 Quarry Rd SE Lancaster, OH 43130-8271	Tom Plute Ph: 740-653-6290 Email: tplute@cirbasolutions.com www.cirbasolutions.com
Doe Run Co	SSLA	18594 State Hwy KK, Boss, MO 65440	Lou Magdits Ph: 314-453-7123 Email: lmagdits@doerun.com www.doerun.com
Evergreen Battery Recycling, LLC	NiMH; Ni-CD	2250 Larchmont Avenue Warren, OH 44483	John Rankin Ph: 440-799-2159 Email: jr@coveir.com www.evergreenbatteryrecycling.com
Gopher Resources	SSLA	685 Yankee Doodle Road Eagan, MN 55121	Roberto Oller Ph: 813-786-9007 Email: roberto.oller@GopherResource.com www.gopherresource.com
International Metals Reclamation Company (INMETCO)	Non-Lithium Primary; NiMH	One INMETCO Drive, Ellwood City, PA 16117	Kevin Duque Ph: 724-758-2805 Email: Kevin.Duque@inmetco.com www.inmetco.com
Interco Trading Company	Lithium Ion; NiMH	10 Fox Industrial Dr. Madison, IL 62060	Kevin Gaus Ph: (618) 798-9500 keving@intercotradingco.com www.intercotradingco.com
Li-Cycle	Lithium Ion	1669 Lake Avenue, Building 350 Eastman Business Park Rochester, NY 14615	Austin Ornelas Ph: 386-341-5373 Email: austin.ornelas@li-cycle.com www.li-cycle.com
Recycling Coordinators, Inc (RCI)	Lithium Ion; NiMH	600 E. Exchange St. Akron, OH 44306	Teague Ostrander Ph: 330-434-4500 Email: teague.ostrander@rci-int.com www.recyclingcoordinators.com
Redwood Materials	Lithium Primary; Lithium Ion; NiMH	2401 Conestoga Drive Carson City, NV	Graham Stevens Ph: 619-708-8133 Email: gstevens@redwoodmaterials.com www.redwoodmaterials.com

For each processor listed in the table below, a list of all solid or hazardous waste registrations or permits applicable to the facility that pertain to the processing of batteries or components of batteries at the facility's location can be found in Appendix G.

Processor	Address	EPA ECHO Enforcement and Compliance Summary
Cirba Solutions Recovery	4930 Holtz Dr, Wixom, MI 48393	No Violation Identified
Cirba Solutions	9384 BC-22A, Trail, BC V1R 4W6, Canada	No Violation Identified ¹
Cirba Solutions	265 Quarry Rd SE Lancaster, OH 43130-8271	CAA No Violation Identified RCRA Violation
Doe Run Co	18594 State Hwy KK, Boss, MO 65440	CAA and RCRA violations. Under an AOC.
Evergreen Battery Recycling, LLC	2250 Larchmont Avenue Warren, OH 44483	No Violation Identified
Gopher Resources	685 Yankee Doodle Road Eagan, MN 55121	No Violation Identified
International Metals Reclamation Company (INMETCO)	One INMETCO Drive, Ellwood City, PA 16117	CWA Significant/Category I Noncompliance Violation
Interco Trading Company	10 Fox Industrial Dr. Madison, IL 62060	CAA No Violation Identified RCRA Violation IL EPA Violation Notice L-2020-00122 5/26/2020
Li-Cycle	1669 Lake Avenue, Building 350 Eastman Business Park Rochester, NY 14615	No Violation Identified
Recycling Coordinators, Inc (RCI)	600 E. Exchange St. Akron, OH 44306	No Violation Identified
Redwood Materials	2401 Conestoga Drive Carson City, NV	No Violation Identified

¹ Violation summary for Canadian sites are reviewed through the R2V3 audit process.

IX. EDUCATION & OUTREACH

A. Citations

Statutory Citation

(7) A description of the education and outreach that will be used to inform consumers about the battery collection program, which must, at a minimum, notify the public that there is a free collection program for all primary and rechargeable batteries as well as the location of the collection sites and how to access the battery collection program;

Regulatory Citation

(g) A description of the education and outreach the BSO will use to inform consumers about the battery

collection program, including:

(1) At a minimum, how the education and outreach will notify the public:

(A) That there is a free collection program for primary and rechargeable batteries;

(B) About requirements and any guidelines for safe collection of batteries;

(C) About the location of the collection sites and any other collection opportunities according to § 3902.3; and

(D) How to access the battery collection program;

(2) How the BSO will:

(A) Identify target audiences and appropriate outreach for those audiences, including through television or radio, news media, public service announcements, mailings, emails, online listservs, social media, and District newsletters;

(B) Determine the frequency of education and outreach campaigns and activities to ensure the public is continually educated; and

(C) Conduct sufficient outreach to assess optimal collection site locations to enhance participation in the program;

(3) How the BSO will distribute educational materials to sellers of primary and rechargeable batteries and battery-containing products, government agencies and nonprofit organizations in the District, and all collection sites describing collection opportunities under the battery stewardship plan; and

(4) Examples of the type of outreach and education materials the BSO plans to provide to the public and to the entities listed in § 3902.1(g)(3).

B. Education & Outreach Practices

Since its inception in 1994, Call2Recycle has invested significant dollars and efforts to educate consumers and manage rechargeable battery recycling across the US, including the District. With the expansion to an all-battery collection and recycling program, Call2Recycle's stewardship plan will build on this investment to advance public awareness in the District.

Based on Call2Recycle's experience and insights gleaned from third-party research, Call2Recycle will apply its comprehensive approach to increase overall awareness and influence recycling behaviors while working collaboratively with collection sites and local stakeholders.

Call2Recycle's education and outreach practices are developed and executed with a high degree of flexibility that enables optimizing its outreach efforts based on a rapidly evolving marketing environment and data-driven insights. The following section overviews this education & awareness approach, including outreach practices, target audiences, messaging pillars, strategies, and metrics.

Outreach Methodologies

Battery technology powers consumers' lives at home, at work, and at play. Call2Recycle will use a multi-pronged, multi-channel approach to inform consumers that a free collection program exists for primary and rechargeable batteries, how and where to recycle them, and encourage DC businesses to join the program. The following communication approaches will provide the foundation for the education and outreach practices of the Call2Recycle stewardship plan:

- Print collateral (i.e., posters, informational cards, fact sheets)
- Social media (i.e., a combination of paid and organic on social platforms such as Facebook, Twitter, LinkedIn, among others)
- Digital media (i.e., instructional videos, web banners, newsletter content, email marketing)

- Call2Recycle website (i.e., dedicated District page, drop-off locator)
- Traditional media (i.e., print, online, radio, television, etc.)
- Earned media (i.e., press releases, articles, interviews)
- In-Person Communication (i.e., events, conferences, site visits)
- Customer Service Support (calls, inquiry management)

As part of Call2Recycle's effort to provide equal access to the program for all, including individuals who are limited (LEP) or non-English proficient (NEP), underrepresented communities, and environmental justice communities, Call2Recycle will provide translated materials and language services, in a minimum of the top six languages, including Amharic, Chinese, French, Korean, Spanish, and Vietnamese.

- **Translated Material:** Call2Recycle's DC webpage will be translated in a minimum of six languages and will house educational and program materials available for download in at least the top six languages. For consumers, these materials will clearly outline the importance of proper battery disposal, the collection opportunities available, and how to properly handle, store, and recycle batteries. For sellers, producers, and stakeholders, materials will highlight the benefits of participating in the battery stewardship plan, as well as any specific requirements. Materials, such as guideline sheets, posters, and fact sheets, will be available in the above referenced languages.
- **Language Services:** Call2Recycle will utilize a language service to offer interpretation services. Those language services will be promoted via a tagline on highly visible digital and printed key program materials, including but not limited to Call2Recycle's DC webpage, collection site posters, advertisements, rack cards, etc.
- Call2Recycle's online site locator will provide language access in the above referenced six languages either via translation or option to access interpretation services.
- Call2Recycle will leverage DC agencies and community networks to identify areas of opportunity (via demographic information) to bring battery collection directly to those communities, such as through events, resulting in a wider collection network and pounds of batteries collected.

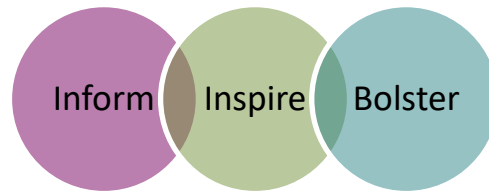
Target Audiences

Call2Recycle's education and outreach plan will focus on delivering tailored messages to the following key target audiences:

- Consumers (English and limited or non-English proficient)
- Producers & Sellers of primary and rechargeable batteries and battery-containing products (including manufacturers and retailers), some who may also serve as part of Call2Recycle's Collection Network
- Call2Recycle's Collection Network (Public & Private)
 - Public-facing: entities who collect directly from consumers (i.e., municipalities, solid waste/transfer stations/recycling facilities, libraries, retailers)
 - Private: entities who utilize primary and rechargeable batteries in their operations (internal collections) but do not accept primary and rechargeable batteries from consumers (i.e., businesses, haulers, hospitals/healthcare facilities, government, etc.)
- District Stakeholders: government agencies, non-profit organizations, and other entities (i.e., industry and trade associations, media outlets, social influencers, etc.) with a broad reach to

diverse and like-minded audiences.

Message Pillars



The following three key message pillars – *Inform*, *Inspire*, *Bolster* – will unify Call2Recycle's education and outreach activities to advance battery collection and recycling across all channels.

1. ***Inform*** target audiences
 - a. Explain that there is a new law and why it is important
 - b. Introduce Call2Recycle and its role
 - c. Highlight that a free program now exists for primary and rechargeable batteries
 - d. Educate on how to access the program and where to find locations of collection sites
2. ***Inspire*** key audiences to collect and recycle primary and rechargeable batteries
 - a. Continue momentum to promote the ease and importance of battery recycling
 - b. Motivate audiences to manage primary and rechargeable batteries safely and responsibly at end-of-life.
3. ***Bolster*** battery collections
 - a. Introduce new and unique ways to make battery recycling more convenient and safer for collection sites and consumers
 - b. Strengthen the existing collection network through enrollments, engagements, and enhancements

C. Strategies, Tactics & Deliverables

Strategies

Call2Recycle's education and outreach program will use a phased approach – pre-launch, launch, and ongoing, as described below, to establish, build, and influence behaviors, attitudes, and actions around battery recycling in the District. This approach also ensures that collection sites are adequately prepared to accept a potential influx of batteries.

- ➔ **Phase I: Pre-launch (January –October 2023):** *inform* target audiences through multiple touchpoints that a free and easy way to recycle all primary and rechargeable batteries is coming to the District and clearly communicating how they can participate.
- ➔ **Phase II: Launch (November - December 2023):** communicate that a free battery collection program now exists district-wide and *inspire* target audiences to collect and recycle primary and rechargeable batteries.
- ➔ **Phase III: Ongoing (2024 - 2026):** *bolster* outreach and education efforts to motivate District consumers, collection sites, producers & sellers, and stakeholders to repeatedly take action. Call2Recycle will continue to explore opportunities to increase convenience for both collection sites and consumers to ensure continuous improvement and performance.

➔ **Phase 1: Pre-launch (January – October 2023)**

Call2Recycle will use the pre-launch phase to generate early awareness, secure producer support, and enhance its battery collection network.

Pre-launch Objectives

- Inform all audiences (listed above) of District's battery stewardship law and reinforce their roles and responsibilities within the program, including the general disposal ban (effective August 1, 2023).
- Develop an enthusiastic and motivated stakeholder base (producers and collection network)
- Build early, widespread awareness and excitement that no-cost, battery recycling will soon be available across the District.

Key Tactics & Deliverables

- Build program awareness with consumers, collection sites, and stakeholders through customized creative and messaging that will highlight the disposal ban, that a free collection program is coming soon for primary and rechargeable batteries, and how to access the battery collection program via the online site locator (www.call2recycle.org/locator) and toll-free phone locator (877-2-RECYCLE).
- Reveal an updated dedicated District website landing page (call2recycle.org/dc) that provides valuable resources to consumers, collection sites, producers, and other stakeholders, including:
 - Consumers: How the program works, FAQs, and general recycling information
 - Collection Network: customized materials (posters, web banners, press releases and videos) to promote participation and educate consumers
 - Media: fact sheets and images
 - Producers: links to the law, FAQs on steward fees, list of participating Producers and their brands.
- To support this phase, Call2Recycle's best-in-class customer success team will remain available via its toll-free information line (1-877-723-1297) and dedicated email (customerservice@call2recycle.org) to answer general program questions, engage collection sites, support inquiries and process orders for collection materials.
- Consumers
 - Deploy pre-launch messaging through various channels, including digital platforms and collection partners, to tease the program prior to November 2023 launch.
- Collection Network and Sellers:
 - Call upon existing longstanding partnerships with National retailers to communicate the program change internally (employee-wide communications) and externally (customer-facing, in-store signage)
 - Deploy email campaign informing of disposal ban, upcoming availability of expanded battery collection program in the District, and encourage participation
 - Call2Recycle will design point-of-purchase, retail display materials, and informational cards to easily illustrate proper bagging and taping. These materials will be offered to District collection sites to place alongside battery sale displays or collection boxes, indicating that primary and rechargeable batteries can be recycled free of cost in District. Materials may include a scannable,

multilingual QR Code that will link the consumer to the dedicated landing page and/or include the language services tagline, as spacing permits.

- Producers:
 - Deploy email communications, call campaigns, and one-on-one outreach to existing and prospective manufacturers to communicate regulatory obligations in the District
 - Maintain an active list of participating manufacturers and brands on the Call2Recycle website
 - Create resources to support on-time brand reporting through Call2Recycle's secure online portal, *GreenTrax*
- Key Stakeholders:
 - Deploy email communications, call campaigns, and one-on-one outreach to communicate program participation opportunities in the District
 - Highlight the program via website and social media platforms,
 - Implement media relations outreach designed to inform and secure interest from trade and local media about the new program

➔ **Phase II: Launch (November-December 2023)**

During the launch phase, Call2Recycle will focus its attention on widely communicating the new comprehensive battery collection program.

Launch Objectives

- Generate widespread visibility of primary and rechargeable battery collection program
- Educate all audiences on the August disposal ban, that a District-wide solution now exists for the free recycling of primary and rechargeable batteries and motivating them to take action.

Key Tactics & Deliverables

- Enhance the online site locator and enrich the *About This Location* feature with relevant DC program information [(free, materials accepted and not accepted, language access service availability, and operating hours (if available)].
- Call2Recycle will deploy a multi-prong campaign to serve as the springboard for the launch of the district-wide education and awareness campaign:
 - Create and disseminate press release announcing the program (November 2023)
 - Engage the District Government on a potential press event to kick-off the new program and will invite the media, local government, collection sites, and other interested groups and individuals.
 - Media Relations: Call2Recycle will actively engage media outlets through the development of articles, press releases, and relevant content to secure interviews and program interest.
- As Call2Recycle's 2022 commissioned research results showed, DC consumers identified city or local government, online, their local trash company or recycling center, social media, and direct mail, as the top five channels of how they would like to receive battery recycling information. Therefore, in conjunction with the above, Call2Recycle will promote its general program offerings to ensure consumers and businesses know how to get involved and where to find a location for recycling:
 - Promote the availability of a new, free battery recycling program via digital and social outlets [(Facebook, Twitter, local, community-building platforms (for

example, NextDoor, which currently serves over 130 neighborhoods in the District), and local associations, etc.)) with the call to action driving consumers to the online locator (found on call2recycle.org).

- Develop and electronically distribute a DC Program Guide to all District stakeholders, including government entities and solid waste and recycling service providers (also will be available on the DC-specific landing page) that will include materials about the program, how to get involved and promote the program, including fact sheets, FAQs, education tools (newsletter text, web banners, social media content, etc....), and links to download and order collateral (signage and handouts), etc.
- During this phase, Call2Recycle's customer success team would continue to serve the District collection network through inbound and outbound call and email campaigns.

➔ **Phase III: Ongoing (January 2024 and Beyond)**

To ensure the District battery collection program remains top-of-mind for consumers, collection sites, producers, and key influencers, Call2Recycle will develop and implement an annual outreach and education plan. While a detailed plan will exist, Call2Recycle will allow for modifications to its initiatives based on key learnings and measures of success.

Ongoing Objectives

- Increase consumer awareness levels
- Retain and grow collection network
- Ensure the program remains appealing as the novelty wears off
- Generate media relations opportunities across the District

Key Tactics & Deliverables

- Consumer
 - Drive consumer awareness to increase battery collections through quarterly campaigns that align with key seasonal activities or higher purchasing times that can be replicated each year, which may include National Battery Day (Feb), Earth Day (April), Back to School, and Holiday.
 - Deploy an 'Always On' strategy to drive awareness consistently throughout the year using traditional and digital channels.
 - Reinforce safe battery management with enhanced safety messaging and training, such as Avoid the Spark, to depict that no battery should be disposed of in regular trash or recycled in the "blue bin", how to properly bag and tape batteries, and emphasize that primary and rechargeable batteries must be recycled only at specially designated battery drop-off locations.
 - Produce collateral and compelling content that promotes local benefits and ease of battery recycling, including the development and distribution of a District-centric public service announcement (PSA) campaign to highlight the availability and importance of battery recycling and emphasize safety and environmental motivations. The PSA campaign will be deployed through various channels, which could include distribution via TV, radio, digital, and will be available on the program's DC landing page, and available to DOEE and other stakeholder groups, such as collection sites, producers, and solid waste and recycling associations to help spread the message.
 - Distribute a postcard mailing to DC residents to inform them that a program exists and

drive them to the dedicated landing page for more information and to find available drop-off locations in their area. Call2Recycle will segment households in each Ward based on market research and available data overlaid with proximity to available collection sites.

- Distribute a postcard mailing to DC stakeholders, prospective collection sites, and sellers/producers to inform them of the program, benefits of participating, and how to get involved.
- Continually enhance the District-specific landing page (call2recycle.org/dc) to include relevant content and updated, customized program materials based on consumer and collection site feedback.
- Based on 2023 consumer research results, Call2Recycle will identify the best methods to supplement traditional and digital marketing efforts to reach the diverse out-of-home market in DC, which may include Metrobus or Metrorail system advertising, and expanded messaging and outreach to schools and youth audiences to help shape recycling behaviors and increase collections for long-term program success.
- Implement a strong press outreach program, including various activities from pitching segments on local morning programs, a satellite media tour, a blogger tour with bursts of online posts from high-traffic influential bloggers, and press releases distributed via the newswire to raise visibility and highlight District battery recycling progress.
- Explore opportunities to collaborate with other stewardship programs operating in the District to increase awareness and encourage the recycling of less mainstream materials, like primary and rechargeable batteries. In other areas, Call2Recycle has done similar stewardship program collaboration through a newspaper insert in English and Spanish, which resulted in positive results.
- Collection Network:
 - Maximize budget to maximize impact by partnering with collection sites and other strategic entities to extend consumer reach, including signage and point-of-sale material.
 - Call2Recycle will utilize webinars, phone, email, and, when possible, in-person site visits to emphasize best practices for safe packaging and shipping primary and rechargeable batteries. Expand battery safety education and training outreach, materials, and offerings, including staff training, videos, how-to guides, and specialized packaging for handling and transporting.
 - A targeted engagement campaign will allow large District businesses and corporations to demonstrate their sustainable business practices by offering their employees more information and access to convenient battery collection & recycling.
 - Site outreach campaign minimally 4x/year via phone, email, or in-person visits to review the program offerings and obtain feedback.
 - Invest in developing tools and resources that drive collection site retention and demonstrate the value of participation, including signage, collateral, awards program, etc.
 - Diversify the collection network by expanding the availability of battery recycling to align with consumers' shopping patterns – eCommerce, grocery/general merchandise, local pickup, and delivery.
 - Call2Recycle will analyze its public and private collection network and, if necessary, explore options to augment its physical collection network with a solution to underserved areas of the District. This could be through a potential kiosk, battery mail-back where District consumers can obtain a kit or envelope to fill with primary and rechargeable batteries and return for recycling or through door-to-door collections. Call2Recycle would inform consumers of any available option through direct-mail, community-based social networks, such as Facebook or NextDoor, digital channels, and local solid waste entities.

- Producers
 - Perform audits at contracted battery sorters to identify battery brands collected in the District that are not fulfilling their obligations (i.e., free-riders)
 - Highlight producer program participation and provide tools producers can utilize to inform customers of their involvement and the battery recycling program availability.
- Key Influencers
 - Work with DC agencies to identify public and private conferences, events, etc. where battery recycling could be highlighted as a new program.
 - Highlight the District's battery collection recycling progress through public-facing channels like the website and/or social media.
 - Create influencer campaigns to reach social communities to promote awareness and engagement.

D. Additional Enhancements & Continuous Improvements

- **Research**
 - **Third-Party Research on Consumer Awareness & Behavior:** Call2Recycle will annually commission similar third-party research to gain deeper insights into consumer recycling behavior, gauge the effectiveness of education and outreach activities, understand behaviors and demographics of engaged and disinterested recyclers, and tailor its plan to target those audiences.
 - **Informal Program feedback:** engage these stakeholders through various methods, including but not limited to social media and email, at least 1x per year to survey target audiences to identify battery collection and recycling barriers. Insights gleaned will be used to pivot messaging, expand offerings, and enhance the program.
- **Marketing Communications Firm:** Call2Recycle will utilize an established DC-based resource, who is well-versed in the market and will play an integral role in engaging collection sites, contributing to specific initiatives, and helping to further refine the tactical details.
- **Budget:** Based on its experience in other regulated jurisdictions, Call2Recycle will commit around 20% of producer fees in year one on Education & Outreach efforts to ensure the District-wide program's success.
- **Delivery of Annual Plans:** To allow for adjustments to changing market conditions, Education and Outreach plan objectives and/or tactics may be adjusted throughout the year. Therefore, annually, Call2Recycle will take all available data, such as behavior and awareness study results (outlined in Section B *Performance Goals*), expand on what's working, make decisions to eliminate what is not working, and then reallocate efforts toward new initiatives that will be tested and tracked annually. Call2Recycle will deliver its Education and Outreach plan annually to DOEE, 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 DOEE staff to share planned outreach strategies for the upcoming year. The meeting will also outline collection goal projections for the upcoming year, including a financial breakdown of the Education & Outreach budget from producer fees.

APPENDIX A - PRODUCERS IN CALL2RECYCLE PROGRAM

STEWARD NAME	STEWARD ADDRESS	CONTACT EMAIL	CONTACT	PHONE NUMBER
3M COMPANY	2501 HUDSON RD, 3M CENTER, SAINT PAUL, MN 55144-1000	RSTEMM@MMM.COM	ROB STEMM	517 363 8788
ACCO BRANDS USA LLC	FOUR CORPORATE DRIVE, LAKE ZURICH, IL 60047	TODD.HERIFORD@ACCO.COM	TODD HERIFORD	847-796-4422
ACE HARDWARE	2200 KENSINGTON CT, OAK BROOK, IL, 60523	LLEVI@ACEHARDWARE.COM	LEIGH LEVINSON	630-990-8819
ACER AMERICA CORPORATION	1730 N FIRST ST., SUITE 400, SAN JOSE, CA 95112	ERIC.GILBERT@ACER.COM	ERIC GILBERT	408-533-7700
AERO DESIGN, INC.	101 CLEMMONS RD, MT. JULIET, TN 37122	MMONTGOMERY@HEICO.COM	MIKE MONTGOMERY	615-754-3440
ADEMCO ADI GLOBAL (RESIDEO)	2 CORPORATE CENTER DR., MELVILLE, NY 11747	BRIAN.CROSS@ADIGLOBAL.COM	BRIAN CROSS	631-692-1000
ALBERTSONS COMPANIES	250 E. PARKCENTER BLVD. BOISE, ID 83706	ANGELA.LEVIN@ALBERTSONS.COM	ANGELA LEVIN	510-514-2639
ALPHA GROUP	ALPHA ANIMATION INDUSTRIAL AREA, JINHONG ROAD EAST & FENGXIANG ROAD NORTH, CHENGHAI DISTRICT, SHANTOU, GUANGDONG PROVINCE, PR CHINA 515800	SUE.SU@AULDEY.CN	SUE SU	86-202-3898278
AMAZON.COM, INC.	410 TERRY AVE N, SEATTLE, WA 98109	EVONNSOON@AMAZON.COM	EVONNE SOON	650-426-1100
AMERICAN LAWNMOWER	2100 N GRANVILLE AVE, MUNCIE, IN 47303-2153	JWEED@AMERICANLAWNMOWER.COM	JACOB WEED	800-633-1501
AMERICAN TOPPOWER	23 ROOSEVELT AVE UNIT 11B, SOMERSET, NJ 8873	FYAN@AMERICANTOPPOWER.COM	FRANK YAN	732-821-1000
AOB PRODUCT COMPANY	1800 NORTH RTE ZSTE A/STEVE BARTON, COLUMBIA, MO 65202	DBROWN@AOB.COM	DOUG BROWN	573-607-2459
APC AMERICA INC. SCHNEIDER ELECTRIC	132 FAIRGROUNDS RD, WEST KINGSTON, RI 02892	RAYMOND.LIZOTTE@SCHNEIDER-ELECTRIC.COM	RAYMOND LIZOTTE	978-930-4141

ARLO	480 N McCARTHY BLVD, SUITE 200, MILPITAS, CA 95035	DLEONG@ARLO.COM	DOUG LEONG	760-476-8700
ARRIS GROUP, INC.	3871 LAKEFIELD DR, SUWANEE, GA 30024-1292	BORIS.KOKTOVIC@COMMSCOPE.COM	BORIS KOKTOVIC	678-473-8763
ASUS COMPUTER INTERNATIONAL, INC.	48720 KATO ROAD, FREMONT, CA 94538	JULIE2_KUO@ASUS.COM	JULIE KUO	510-739-3777
AWAY (JRSK, INC - CORPORATE NAME)	503-511 BROADWAY, NEW YORK, NY 10012	STEVEN.SUTHERLAND@AWAYTRAVEL.COM	STEVEN SUTHERLAND	336-293-3639
BACCUS GLOBAL	621 NW 53 RD ST, SUITE 450, BOCA RATON, FL 33487	P.WRIGHT@BACCUSLLC.COM	PATRICK WRIGHT	561-361-4900
BALMUDA INC.	5-1-21 KYONANCHO, MUSASHINO-SHI, TOKYO, JAPAN 180-0023	TATSUYA_SUZUKI@BALMUDA.COM	TATSUYA SUZUKI	81-3-5293-6279
BARNES & NOBLE (NOOK DIGITAL)	33 EAST 17 TH STREET, NEW YORK, NY 10003	CPOCHINTESTA@BN.COM	CARLO POUCHINTESTA	212-352-3806
BAYCO PRODUCTS, INC.	640 SANDEN BLVD, WYLIE, TX 75098-4922	MSITU@BAYCOPRODUCTS.COM	MARK SITU	469-326-9400
BISELL HOMECARE, INC	2345 WALKER AVE NW, GRAND RAPIDS, MI 49544-2597	JOHN.HORKY@BISELL.COM	JOHN HORKY	615-210-1035
BIZMAIL (PARTYHOLIC LIMITED)	11/F SUNRISE INDL BLDG BLK A 10, HONG MAN STREET, HONG KONG, CHINA	IVAN@KAIYEE.BIZMAIL.HK	IVAN WONG	852-2558-1463
BROTHER INTERNATIONAL CORPORATION	200 CROSSING BLVD, BRIDGEWATER, NJ 08807-2861	VICKIE.BERRY@BROTHER.COM	VICKIE BERRY	908-704-1700
CAR MATE USA, INC.	383 VAN NESS AVE #1603, TORRANCE, CA 90501	JUNPEI.TOMONAGA@CARMATE-USA.COM	JUNPEI TOMONAGA	310-533-1647
CANON USA INC.	ONE CANON PARK, MELVILLE, NY 11747	ALIRIO@CUSA.CANON.COM	ANDREW BAYSA LIRIO	631-330-2179
CHERVON HK LIMITED	1203 E WARRENVILLE RD, NAPERVILLE, IL 60563	BGROTH@NA.CHERVONGROUP.COM	BRADY GROTH	331-215-9530
CISCO SYSTEMS CANADA Co.	PO BOX 696092, SAN ANTONIO, TX 78269	AKFEKETE@CISCO.COM	AKOS FEKETE	408-527-4449
CLEVA NORTH AMERICA	601 REGENT PARK CT, GREENVILLE, SC 29607	ALAIN.DUQUE@CLEVA-NA.COM	ALAIN DUQUE	864-334-1210
CONAIR CORPORATION	1 CUMMINGS POINT RD, STAMFORD, CT 06902-	JAMES_SANDER@CONAIR.COM	JAMES SANDER	203-351-9458

	7900			
CTL	9700 SW HARVEST CT BLDG 100, BEAVERTON, OR 97005-4299	MMAHANAY@CTL.NET	MICHAEL MAHANAY	503-504-5211
DAYE NORTH AMERICAN	3400 ST VARDELL LN SUITE D, CHARLOTTE, NC 28217	GRAYA@DAYEOPE.COM	GRAY ABERCROMBIE	704-591-1258
DEERE & COMPANY (JOHN DEERE)	1 JOHN DEERE PL, MOLINE, IL 61265- 8098	PECKCHELSEYJ@JOHNDEERE. COM	CHELSEY PECK	309-765-8000
DELHAIZE AMERICA (HANNAFORD SUPRMKTS) MARTIN FOODS OF SOUTH BURLINGTON, LLC	2110 EXECUTIVE DR, SALISBURY, NC 28145	GEORGE.PARMENTER@AHOL DDELHAIZEUSA.COM	GEORGE PARMENTER	704-310-3527
DELL INC	1 DELL WAY, ROUND ROCK, TX 78682-7000	MELISSA_MALLORY@DELL.C OM	MELISSA MALLORY	512-720-5436
DELTRAN USA, LLC	801 E INTL SPEEDWAY BLVD, DELAND, FL 32724-2598	CARSON.CLARKE@DELTRAN- GLOBAL.COM	CARSON CLARKE	386-736-7900
DOLLAR GENERAL CORPORATION	100 MISSION RIDGE, GOODLETTSVILLE, TN 37072	TFRANCIS@DOLLARGENERAL. COM	TRACEY FRANCIS	615-855-4862
DORCY INTERNATIONAL	2700 PORT RD, COLUMBUS, OH 43217-1136	KATHY@DORCY.COM	KATHY VERHOEVEN	614-497-5830
DOREL JUVENILE GROUP	2525 STATE STREET, COLUMBUS, IN 47201	DDESIMONE@DJUSA.COM	DAN DESIMONE	508-216-1843
DURACELL US OPERATIONS	14 RESEARCH DR, BETHEL, CT 06801- 1040	LANCE.J@DURACELL.COM	JOLIE LANCE	800-551-2355
DYNABOOK	5241 CALIFORNIA AVE SUITE 100, IRVINE, CA 92617	VU.PHAN@DYNABOOK.COM	VU PHAN	949-587-6400
DYSON US UNLIMITED	1330 W FULTON ST FL 5, CHICAGO, IL 60607- 1137	CHIP.LIEBENOW@DYSON.CO M	CHIP LIEBENOW	312-846-7714
ELEMENT TV COMPANY, LP	7151 METRO BLVD., EDINA, MN 55439	KRISTIN.L@ELEMENTELECTR ONICS.COM	KRISTEN LINDBERG	952-967-5500
ELI LILLY AND COMPANY	893 S DELAWARE ST., INDIANAPOLIS, IN 46225	WILZ_WILLIAM@LILLY.COM	WILLIAM WILZ	317-450-5137
EMERSON (PROTEAM)	8100 W FLORISSANT AVE, BUILDING T, SAITN LOUIS, MO 63136	MATT.REIMERS@EMERSON.C OM	MATT REIMERS	208-377-9700

ENERGIZER	533 MARYVILLE UNIVERSITY DR FACILITY SERVICES, SAINT LOUIS, MO 63141-5801	KEVIN.REJENT@ENERGIZER.COM	KEVIN REJENT	314-985-2000
ENERSYS DELAWARE INC.	2366 BERNVILLE RD, READING, PA 19605- 9457	RANDY.REYER@ENERSYS.COM	RANDY REYER	610-208-1735
EPOCH BATTERIES (18650 BATTERY STORE)	164 ANDREW DRIVE SUITE 500, STOCKBRIDGE, GA 30281	KEVIN@EPOCHBATTERIES.COM	KEVIN VASOVICH	800-547-3050
EPSON AMERICA, INC.	3131 KATELLA AVE., LOS ALMITOS, CA 90720	ELIZABETH.PULIDO@EA.EPSO N.COM	ELIZABETH PULIDO	562-676-6294
EVOLUTION POWER TOOLS	8363 RESEARCH DRIVE, DAVENPORT, IA 52806	MARK.FELIX@EVOLUTIONPO WERTOOLS.COM	MARK FELIX	563-359-1252
FINISH THOMPSON	921 GREENGARDEN RD, ERIE, PA 16501-1525	DRROLL@FINISHTHOMPSON. COM	DANIEL ROLL	814-455-8518
FOURSTAR GROUP USA, INC.	189 MAIN STREET, SUITE 31, MILFORD, MA 01757	TED.C@FSGROUP-INC.COM	TED CONLON	508-473- 7388
FUJIFILM HOLDINGS AMERICA CORP	200 SUMMIT LAKE DR, VALHALLA, NY 10595- 1338	GMENON@FUJIFILM.COM	GIRISH MENON	914-789-8293
FUJITSU (PFU AMERICA)	350 COBALT WAY, SUNNNYVALE, CA 94085	HKUBO.PFU@FUJITSU.COM	HIROYUKI KUBO	408-992-2900
GARMIN INTERNATIONAL, INC	1200 E 151 ST ST, OLATHE, KS 66062- 3426	BRYAN.DYE@GARMIN.COM	BRYAN DYE	913-397-8200
GETAC INC.	400 EXCHANGE SUITE 100, IRVINE, CA 92602	SHANNON.BARONOWSKI@G ETAC.COM	SHANNON BARONOWSKI	612-280-6436
GIINII	2160 LUNDY AVE STE 210STE 210, SAN JOSE, CA 95131-1868	LHUANG@GIINII.COM	LEON HUANG	408-433-9226
GLOBAL TECHNOLOGY SYSTEMS, INC.	550 COCHITUATE RD, FRAMINGHAM, MA 01701-4654	AANDERSON@GTSPower.C OM	ASHLEY ANDERSON	508-650-1172
GREENWORKS (JIANGSU) CO., LTD	65 XINGGANG RD., CHANGZHOU, JIANGSU, CHINA	VINCENT.DU@GLOBETOOLS. COM	VINCENT DU	15 86-117- 9016
GOOGLE INC.	1600 AMPHITHEATRE PKWY, MOUNTAIN VIEW, CA 94043- 1351	JKEYPERS@GOOGLE.COM	JEFF KEYPERS	650-253-7177
GoPro	3025 CLEARVIEW WAY, SAN MATEO, CA 94402	MICHELLETSAI@GOPRO.COM	MICHELLE TSAI	800-565-9966

GRIOT'S GARAGE	3333 SOUTH 38TH STREET, TACOMA, WA 98406	ELIJAH.SHERIDAN@GRIOTSGARAGE.COM	ELIJAH SHERIDAN	253-203-1425
GS YUASA ENERGY SOLUTIONS, INC.	1150 NORTH MEADOW PARKWAY STE 110, ROSWELL, GA 30076	AKIRA.IWATA@GSYUASSA-ES.COM	AKIRA IWATA	678-762-4818
HAMILTON BEACH BRANDS, INC.	4421 WATERFRONT DRIVE, GLEN ALLEN, VA 23060	PAUL.BLANKENSHIP@HAMILTONBEACH.COM	PAUL BLANKENSHIP	804-527-7326
HARMAN INTERNATIONAL INDUSTRIES, INCORPORATED	8500 BALBOA BLVD, NORTHRIDGE, CA 91329	HELEN.OMAPAS@HARMAN.COM	HELEN OMAPAS	818-895-3733
HD SUPPLY	3400 CUMBERLAND BLVD SE, ATLANTA, GA 30339-5940	CHRIS.COLLINS@HDSUPPLY.COM	CHRIS COLLINS	770-852-9627
HEWLETT PACKARD INC	3000 HANOVER ST, PALO ALTO, CA 94304-1185	JEANNE.KRANIG@HPE.COM	JEANNE N KRANIG	650-857-1501
HILTI, INC.	5400 S 122 ND EAST AVE, TULSA, OK 74146-6099	ELISE.SHOONMAKER@HILTI.COM	ELISE SHOONMAKER	866-445-8827
HOMEDICS USA, LLC	3000 N PONTIAC TRL TREVOR JARVI, COMMERCE TOWNSHIP, MI 48390-2720	YASSEZ.NAFEI@FKABRANDS.COM	YASSEZ NAFEI	248-863-3000
HONEYWELL INTERNATIONAL INC.	101 COLUMBIA ROAD, MORRISTOWN, NJ 07960	ADRIANA.VELASCO@HONEYWELL.COM	ADRIANA VELASCO	973-889-8934
HP INC.	1501 PAGE MILL RD, PALO ALTO, CA 94304-1100	JKWAN@HP.COM	JOYCE KWAN	650-857-2442
HTC CORPORATION	NO. 23 XINGHUE ROAD, TAoyUAN CITY, CHINA	JOHNSON_YANG@HTC.COM	JOHNSON YANG	886-375-3252
HUIZHOU HIGHPOWER TECH	XINHU INDUSTRIAL ZONE, MA'AN TOWNHUICHENG DISTRICT, HUIZHOU CITY, CHINA	JYXIE@HIGHPOWERTECH.COM	JIYONG XIE	85-235650188
HUSQVARNA AB	9335 HARRIS CORNERS PKWY, SUITE 500, CHARLOTTE, NC 28269	STEVEN.KERN@HUSQVARNA GROUP.COM	STEVEN KERN	704-597-5000
HYTORC DIVISION UNEX CORPORATION	333 ROUTE 17 NORTH, MAHWAH, NY 07430	MSHANNON@HYTORC.COM	MICHAEL SHANNON	201-512-9500
ICON ENERGY	BUILDING 1, 68 XINXIA ROAD, PINGHU ST.,	FANLUJUN@HIGHPOWERTECH.COM	LIJUN FAN	86-15013688741

	LONGGANG, CHINA			
IDX	24422 MAIN ST STE 502C/O TESMIC SYSTEM SVCS, PLATTSBURGH, CA 90745-6382	IKUYO@IDX.TV	IKUYO KAWANO	310-891-2800
INSPIRED ENERGY, LLC	25440 NW 8 TH PL, NEWBERRY, FL 32669	DAVE.HELLRIEGEL@INSPIRED -ENERGY.COM	DAVE HELLRIEGEL	352-472-4855
INTERMETRO INDUSTRIES CORPORATION	651 N WASHINGTON ST, WILKES BARRE, PA 18705-1799	ROCKY.SELENSKI@METRO.CO M	ROCKY SELENSKI	800-523-7114
INTEX RECREATION CORP.	4001 VIA ORO AVE., SUITE 210, LONG BEACH, CA 90810	ZMADZAR@INTEXCORP.COM	ZORAN MADZAR	310-549-5400
INVACARE	1 INVACARE WAY, ELYRIA, OH 44035- 4196	NSTEIMLE@INVACARE.COM	NICHOLAS STEIMLE	440-329-6000
I-PRO	8550 FALLBROOK DRIVE SUITE 200, HOUSTON, TX 77064	MICHAEL.BAUMANN@I- PRO.COM	MICHAEL BAUMANN	713-621-9779
I-ROBOT	8 CROSBY DR, BEDFORD, MA 01730- 1402	CECHERSLEY@IROBOT.COM	CARL ECHERSLEY	781-430-3000
JASCO PRODUCT COMPANY	10 E MEMORIAL RD, OKLAHOMA CITY,OK,73114-2205	SWARD@BYJASCO.COM	SAM WARD	405-752-0710
JC TECHNOLOGY INC. DBA ACE COMPUTERS	575 LIVELY BLVD, ELK GROVE VILLAGE, IL 60007-2013	JOHN@ACECOMPUTERS.CO M	JOHN SAMBORSKI	847-952-6900
JIANGSU DONGCHENG M&E TOOL	POWER TOOLS INDUSTRIAL PARK OF TIANFEN, QIDONG CITY, CHINA	CAIJUN@CHINA- DONGCHENG.COM	CAI JUN	+15 86-117- 9016
JVC KENWOOD	500 VALLEY RD SUITE 203, WAYNE, NJ,07470-8436	ASEAY@US.JVCKENWOOD.C OM	ANGIE SEAY	973-317-5000
KAN (ZHEJIANG KAN BATTERY Co.)	998 KAN RD, SUICHANG, ZHEJIANG, CHINA 323300	YINGYING@KANBATTERY.CO M	YING YING	0086-578- 8181596
KEYENCE	669 RIVER DRIVE SUITE 403, ELMWOOD PARK, NJ 7407	BGAEHRING@KEYENCE.COM	BRIAN GAEHRING	888-539-3623
KWONNIE ELECTRICAL PRODUCTS LTD	1001B, 10F, SUNBEAM CENTRE, KOWLOON, HONG KONG, CHINA	JIMMY.LAU@KWONNIE.COM	JIMMY LAU	85- 223431726
KYOCERA SENCO	8450 BROADWELL RD., CINCINATI, OH 45244	TKABBLES@KYOCERA- SENCO.COM	TONY KABBLES	513-388-2000

L3 HARRIS	1025 W NASA BLVD, MELBOURNE, FL 32919-0001	COSTA.TRIANTAFYLLIDIS@L3 HARRIS.COM	COSTA TRIANAFYLLIDIS	321-334-9449
LEDVANCE	200 BALLARDVALE STREET, WILMINGTON, MA 01887	T.HILL@LEDVANCE.COM	TAMMY HILL	978-753-5158
LEGO SYSTEMS, INC.	100 PRINT SHOP RD, ENFIELD, CT 06082- 2372	AURORA.CHAPA@LEGO.COM	AURORA CHAPA	860-763-6646
LENOVO	1009 THINK PL BUILDING 2/5E2, MORRISVILLE, NC 27560-9002	KFOX@LENOVO.COM	KIM FOX	919-621-2756
LG ELECTRONICS USA, INC.	111 SYLVAN AVE., ENGLEWOOD CLIFFS, NJ 76320	MADLINE.SMITH@LGE.COM	MADLINE SMITH	201-816-2001
L'IMAGE HOME PRODUCTS INC.	1175 PLACE DU FRÈRE- ANDRÉVIA PARKING, MONTREAL, QC H3B 3X9	ETIENNE.RACINE@SEGPROD UCTS.COM	ETIENNE RACINE	514-943-9511
LOGIC TECHNOLOGY	600 COLLEGE RD. EAST, #1100, PRINCETON, NJ 8540	EMIL.WEISS@JTI.COM	EMIL WEISS	609-525-4420
LOGITECH INC.	7600 GATEWAY BLVD, NEWARK, CA 94560- 1159	PARUNKUNDRUM@LOGITEC H.COM	PRAKASH ARUNKUNDRUM	510-795- 8500
LUXOTTICA OF AMERICA	4000 LUXOTTICA PLACE, MASON, OH 45040	SARA.FRANCESCUTTO@LUXO TTICA.COM	SARA FRANCESCUTTO	212-302-1200
MAG INSTRUMENT, INC	2001 S HELLMAN AVE, ONTARIO, CA 91761- 8019	JZECCHINI@MAGMAIL.COM	JIM ZECCHINI	909-947-1006
MAHA ENERGY	14311 CHAMBERS RD, TUSTIN, CA 92780	PETERCC@MAHAENERGY.CO M	PETER CHUEH	626-363-9017
MAKITA U.S.A. INC.	14930 NORTHAM STREET, LA MIRADA, CA 90638	TKAWAMOTO@MAKITAUSA. COM	TAKESHI KAWAMOTO	510-657-9881
MATTEL, INC.	333 CONTINENTAL BLVD, EL SEGUNDO, CA 90245-5012	HEATHER.BRAMBLE@MATTE L.COM	HEATHER BRAMBLE	310-252-3384
MAX Co., LTD	6-6 NIHONBASHI HAKOZAKI-CHO, ICH-KU, TOKYO, JAPAN 103- 8502	KUKOBAYSHI@MAX- LTD.CO.JP	KUNITAKA KOBAYASHI	81-336- 698131
MICROSOFT	1 MICROSOFT WAY, REDMOND, WA 98052-8300	CINTIA.GATES@MICROSOFT. COM	CINTIA GATES	512-795-5711

MIDLAND	5900 PARRETTA DR, KANSAS CITY, MO 64120-2134	JPENSICK@MIDLANDRADIO.COM	JEREMY PENSICK	816-241-8500
MILLER MANUFACTURING COMPANY	1450 13 TH St W, GLENCOE, MN 55336- 1555	CSKAPPEL@FRANSENCORPORATION.COM	CHRISTINA SKAPPEL	651-982-5100
MOTOROLA MOBILITY	222 MERCHANDISE MART LAZA, CHICAGO, IL 60654	MELENDEZ@MOTOROLA.COM	ROBERTO MELENDEZ	682-209-4523
MOTOROLA SOLUTIONS	28 WEDGE HILL DR, OXFORD, CT 06478- 1936	THERESA.JORDAN@MOTOROLASOLUTIONS.COM	THERESA JORDAN	203-650-7310
MYCHARGE	123 W BROWN ST, BIRMINGHAM, MI 48009-6018	NICK.MOCZARSKI@MYCHARGE.COM	NICK MOCZARSKI	888-251-2026
NATIONAL POWER COMPANY	4330 W BELMONT AVE, CHICAGO, IL 60641- 4524	TVRABLIK@NATIONALPOWER.COM	TOM VRABLIK	773-685-2662
NEPTUNE TECHNOLOGY GROUP INC.	1600 ALABAMA HIGHWAY 229, TALLASSEE, AL 36078	SBEASLEY@NEPTUNETG.COM	STEVE BEASLEY	334-283-6555
NETGEAR, INC.	350 E PLUMERIA DR, SAN JOSE, CA 95134- 1911	EMMA.TSAI@NETGEAR.COM	EMMA TSAI	408-907-8000
NEW LEADER BATTERY, LTD.	FLAT 4/F. BLOCK CAMELPOINT BUILDING KW, HONG KONG, CHINA	SZ@NEWLEADER.CN	YOLANA JOANG	00852-2790- 6280
NIKKISO MEDICAL	7676 HAZARD CENTER DR, SAN DIEGO, CA 92108	MIKE.OCONNELL@NIKKISO MEDICAL.US	MIKE O'CONNELL	858-222-6320
NIKON INC. EL3R	1300 WALT WHITMAN RD, MELVILLE, NY 11747	VICTORIA.DRAKE@NIKON.COM	VICTORIA DRAKE	631-650-1210
NORMARK	10395 YELLOW CIRCLE DR, HOPKINS, MN 55343-9133	KUANG- SHUN.FAN@RAPALAVMC.COM	KUANG-SHUN FAN	952-933-7060
NOVALOOP (HMD AMERICAS)	1200 BRICKELL, SUITE 510, MIAMI, FL 33131	GEN.SILVEROLI.EXT@HMDGLOBAL.COM	GENEVIEVE SILVEROLI	214-919-9950
NVIDIA CORPORATION	2788 SAN TOMAS EXPY, SANTA CLARA, CA 95051	VENDORINVOICES@NVIDIA.COM	CHELSEA VERHASSELT	408-486-2000
O2COOL, LLC	300 S RIVERSIDE PLAZASUITE 2300,CHICAGO,IL,60 606	JJORGENSEN@O2COOLBRANDS.COM	JOSEPH JORGENSEN	800-200-2665

OCOOPA (CHANGSHA STREETCAT NETWORK TECHNOLOGY CO. LTD.)	ROOM 301-302, BUILDING N111, RONGKE DONGNANHAI COMMUNITY,NO. 469 XIANGZHANG ROAD, YUBUA DISTRICT, CHANGSHA, CHINA	BUSINESS@OCOOPA.COM	HU ZEDA	+86- 18175131009
OM DIGITAL SOLUTIONS AMERICAS, INC.	3500 CORPORATE PKWY, CENTER VALLEY, PA 18034	FRANCES.REILLY@OM- DIGITALSOLUTIONS.COM	FRANCES REILLY	484-896-5000
OMRON HEALTHCARE INC.	9924 8 TH AVE, PLEASANT PRAIRIE, WI 53158-5411	TERRI.INGALLS@OMRON.CO M	TERRI INGALLS	847-247-5626
ORACLE	1235 ELKO DRIVE, SUNNYVALE, CA 94089	DIANE.NIEMIEC@ORACLE.CO M	DIANE NIEMIEC	303-974-3236
OTTER PRODUCTS	209 SOUTH MELDRUM ST., FORT COLLINS, CO 80521	BARRY.PHILLIPS@OTTERPRO DUCTS.COM	BARRY PHILLIPS	858-924-1694
PANASONIC CORPORATION	2 RIVERFRONT PLZ STE 200, NEWARK, NJ 07102-5490	ANDY.SIRJORD@US.PANASO NIC.COM	ANDY SIRJORD	201-348-7000
PARTY DRAGON	RM 1007B, 10/F, LIPPO CENTER, 89 QUEENSWAY, ADMIRALTY, HK, CH	BRANDONT@PARTYDRAGON. COM	BRANDON TAN	852- 25465546
PELICAN PRODUCTS	23215 EARLY AVE, TORRANCE, CA 90505- 4002	BRIAN.WILLIAMS@PELICAN.C OM	BRIAN WILLIAMS	310-326-4700
PELLENC AMERICA INC.	3171 GUERNEVILLE RD, SANTA ROSA, CA 95401	GLENN.MERDAN@PELLENCU S.COM	GLENN MERDAN	707-568-7286
PHILIPS	3000 MINUTEMAN RD1881 ROUTE 46 WEST, ANDOVER, MA 01810-1032	NICOLE.ANAGNOSTARAS@PH ILIPS.COM	NICOLE ANAGNOSTARAS	351-322-6014
PITNEY BOWES	27 WATERVIEW DRIVE MSC 27-3C, SHELTON, CT 6484	KARL.ALLENMAHER@PB.CO M	KARL ALLEN- MAHER	203-922-5752
PLOY (HP) PLANTRONICS INC.	6001 AMERICA CENTER DR, SAN JOSE, CA 95002-2562	PHILIP.ASHTON@HP.COM	PHILIP ASHTON	408-586-6000
POLICE SECURITY (LB MARKETING Co.)	8480 HOLCOMB BRIDGE RD #100, ALPHARETTA, GA 30022	KELLY.HIRES@POLICESECURI TY.COM	KELLY HIRES	86- 68809297105
POSITEC TOOL CORPORATION	10130 PERIMETER PKWY#300,	TODD.ZIMMERMAN@POSITE CGROUP.COM	TODD ZIMMERMAN	704-599-3711

	CHARLOTTE, NC 28216-2447			
POYNT	2155 E. GODADDYWAY, TEMPE, AZ 8528	RTANAKA@GODADDY.COM	RAY TANAKA	720-500-0310
QD LASER	8721 SANTA MONICA BLVD., #844, LA, CA	KUWABARA@QDLASER.COM	MASARU KUWABARA	424-365-9870
RAZOR USA LLC	12723 166 TH ST, CERRITOS, CA 90703	TRODRIGUEZ@RAZORUSA.CO M	TONY RODRIGUEZ	866-467-2967
RJ REYNOLDS	401 N MAIN ST. ATTN: ALEJANDRO TAPIA, 10 TH FLOOR, WINSTON – SALEM, NC 27101	DAVISS12@RJRT.COM	SAMANTHA DAVIS	339-741-0715
ROBERT BOSCH LLC	1 TOWER LANE, SUITE 3100, OAKBROOK, IL 60181	MATTHEW.MESSER@US.BOS CH.COM	MATTHEW MESSER	331-264-5089
ROBERT BOSCH TOOL CORPORATION	1800 W CENTRAL RD, MOUNT PROSPECT, IL 60056	JOSH.MACY@US.BOSCH.CO M	JOSH MACY	877-267-2499
ROYAL CONSUMER TECHNOLOGY	1011 HWY 22 WEST SUITE 202, BRIDGEWATER, NJ 08807-2931	A.HESS@ROYAL.COM	ANDY HESS	908-864-4851
RRC POWER SOLUTIONS	18340 YORBA LINDA BLVD#107-437, YORBA LINDA, CA 92886- 4058	GEORGE.GERWE@RRC- PS.COM	GEORGE GERWE	714-777-3604
RUBIES II LLC	601 CANTIAGUE ROACK ROAD, WESTBURY, NY 10590	MVALENTI@RUBIES.COM	MADELEINE VALENTI	516-337-3473
SAGER ELECTRONICS	4642 WESTERN AVE, LISLE, IL 60532-1543	DPICKREL@SAGER.COM	DAVID PICKREL	630-719-1471
SAMSUNG	19 CHAPIN RD BLDG D, PINE BROOK, NJ 07058-9385	J2.KANG@SAMSUNG.COM	JANE KANG	973-808-6373
SATO AMERICA, LLC	14125 SOUTH BRIDGE CIRCLE, CHARLOTTE, NC 28273	NATHAN.WHEELER@SATO- GLOBAL.COM	NATHAN WHEELER	704-236-3053
SCOSCHE INDUSTRIES, INC.	1550 PACIFIC AVE SUITE A, OXNARD, CA 93033-2451	STEVENK@SCOSCHE.COM	STEVEN KLINGER	800-363-4490
SCUD (FUJIAN) ELECTRONICS	98 JIANGBIN E AVE, MAWEI, FUJIAN, CHINA	ZHANGM@SCUD.CN	ZHANG MING	86-591- 6315888
SDI TECHNOLOGIES INC	1299 MAIN ST, RAHWAY, NJ 07065- 5024	DSTETIN@SDITECH.COM	DAVID STETIN	800-333-3092
SHANGHAI PYTES	NO 3492 JINQIAN RD.,	TRACEY_ZHANG@PYTESGRO	TRACEY ZHANG	86-215-

	FENGXIAN DISTRICT, CHINA	UP.COM		74736668600
SHARKNINJA	89 A ST #100 GUIDO JORGES, NEEDHAM, MA 02494	GJORGES@SHARKNINJA.COM	GUIDO JORGES	617-775-8826
SHARP ELECTRONICS	100 PARAGON DR, MONTVALE, NJ 7645	TPRUITT@SHARPSEC.COM	TRACEY PRUITT	800-237-4277
SHENZHEN HIGHPOWER TECH	BUILDING 1, 68 XINXIA ROADPINGHU STREET LINGGAND DISTRICT, SHENZHEN, CHINA	YLSONG@HIGHPOWERTECH. COM	YULIN SONG	+86 138 2366 1652
SHENZHEN TOP ENERGY Co., LTD.	301, 201, 101, BEI MIAO JIAO LING TONG FU INDUSTRIAL DISTRICT A BUILDING, SHENZHEN, CHINA	2087228340@QQ.COM	FENG WEI	0086- 17388768612
SIGMA CORPORATION	2-4-16 KURIKI, ASAO- KUKAWASAKI-SHI, KANAGAWA, JAPAN	SJYAMAKI@SIGMA- PHOTO.CO.JP	SHINJI YAMAKI	81-44-989- 7430
SNAP-ON	2801 80 TH ST, KENOSHA, WI 53143- 5699	GOVIND.K.ARORA@SNAPON .COM	GOVIND ARORA	262-656-6101
SNOWJOE	221 RIVER ST. FLOOR 13, HOBOKEN, NJ 07030	JBUTTERY@SNOWJOE.COM	JEREMY BUTTERY	732-832-2509
SONOS	614 CHAPALA STREET, SANTA BARBARA, CA 93101	RANDY.BANTON@SONOS.CO M	RANDY BANTON	805-308-8029
SONY CORPORATION OF AMERICA	16535 VIA ESPRILLO, SAN DIEGO, CA 92127	JEREMY.JONES@SONY.COM	JEREMY JONES	212-833-8453
SPRINGPOWER	101 NO. 2, CHAOSHUN INDUSTRIAL ZONE, 101 BUILDING 6 & 101 BUILDING NO 221 ON RENMIN ROAD, FURMIN COMMUNITY, FUCHENG S, SHENZHEN CITY, CHINA	FANLUJUN@HIGHPOWERTEC H.COM	LIJUN FAN	86- 15013688741
SRAM, LLC	1000 W, FULTON MARKET, 4TH FLOOR, CHICAGO, IL 60607	LYERMAKOV@SRAM.COM	LEO YERMAKOV	312-664-8800
STORTRONICS	31829 EIGHT MILE RD, LIVONIA, MI 48152	MSAID@STORTRONICS.COM	MARIO SAID	248-912-1200
TARGET CORPORATION	33 S 6 TH ST STE CC- 3625, MINNEAPOLIS, MN 55402	MARSHALL.LIN@TARGET.CO M	MARSHALL LIN	800-587-2228

TCL	189 TECHNOLOGY DRIVE, IRVINE, CA 92618	NA.LEGAL@TCL.COM	CHUANYONG ZOU	949-233-1959
TECHTRONIC TRADING LLC	29F TWR 2 KOWLOON COMMERCE CTR51 KWAI CHEONG ROAD, KWAI CHUNG, CHINA	BEN.HU@TTI.COM.HK	BEN HU	852-24026888
TENERGY	436 KATO TER, FREMONT, CA 94539-8332	KATHERINE@TENERGY.COM	KATHERINE ZHUANG	510-687-0388
TENNANT COMPANY	10400 CLEAN STREET, EDEN PRAIRIE, MN 55344-2650	SAMANTHA.MCKEOUGH@TE NNANTCO.COM	SAMANTHA MCKEOUGH	763-540-1200
TEXAS INSTRUMENTS	7800 BANNER DR, DALLAS, TX 75251-1602	LOUIS.LE@TI.COM	LOUIS LE	855-226-3113
THE COLEMAN COMPANY	3600 N HYDRAULIC ST, WICHITA, KS 67219-3812	HANNAH.HUFFMAN@NEWE LCO.COM	HANNAH HUFFMAN	316-832-2653
THE GILLETTE CO/BRAUN DIV	1 GILLETTE PARK, SOUTH BOSTON, MA 02127-1028	FITZGERALD.BJ@PG.COM	BRIAN FITZGERALD	617-463-6317
THE GILLETTE CO/ORAL-B DIV	1 GILLETTE PARK – 5B, So. BOSTON, MA 02127-1028	FITZGERALD.BJ@PG.COM	BRIAN FITZGERALD	617-463-6317
THE TORO COMPANY	8111 LYNDALE AVE S, MINNEAPOLIS, MN 55420-1196	JIM.GESSFORD@TORO.COM	JIM GESSFORD	952-888-8801
TOMTOM	2400 DISTRICT AVENUE SUITE 410, BURLINGTON, MA 1803	GITTA.KOSCHEK@TOMTOM.COM	GITTA KOSCHEK	978-287-9555
TONIES, INC.	3000 EL CAMINO REAL BUILDING 4, SUITE 200, PALO ALTO, CA 94306	INTERNATIONAL@TAKE-E-WAY.DE	FLORIAN SPREU	720-500-0310
TRACTOR SUPPLY COMPANY	5401 VIRGINIA WAY, BRENTWOOD, TN 37027	RZICK@TRACTORSUPPLY.COM	RYAN ZICK	615-440-4000
TRANSCOSMOS AMERICA INC.	879 W. 190 TH ST. SUITE 1050, GARDENA, CA 90248	ERICH@TRANSCOSMOS.COM	ERIC HLADILEK	310-245-0705
TRANSOURCE SERVICES CORP	2405 W UTOPIA RD, PHOENIX, AZ 85027	NOEG@TRANSOURCE.COM	NOE GONZALAZ	623-879-8882
TRAXXAS L.P.	6250 TRAXXAS WAY, MCKINNEY, TX 75070	CWILLIAMS@TRAXXAS.COM	CARL WILLIAMS	888-881-2997
TTEK ASSEMBLIES INC.	3600 ALAN SYVERSON DR, BARNUM, MN	PURCH@TTEKAI.COM	MIKE LINE	218-389-6187

	55707-7004			
TWS TECHNOLOGY(GUANGZHOU) LIMITED	NO.39 NANYUNSAN RD, SCIENCE CITY OF GUANGZHOU HIGH-TECH INDUSTRIAL ZONE, CHINA	LI.JUN@TWS.COM	LI JUN	020-22215118
ULTRALIFE	2000 TECHNOLOGY PKWY, NEWARK, NY 14513-2175	DGOULD@ULBI.COM	DAVE GOULD	315-332-7100
UNIDEN AMERICAN CORPORATION	3001 GATEWAY DR. SUITE 130, IRVING, TX 75063	SROBY@UNIDEN.COM	STEVE ROBY	817-858-3300
VARTA MICROBATTERY INC.	555 THEODORE FREMD AVE SUITE C 304, RYE, NY 10580-1451	JAMES.BREMNER@VARTA-MICROBATTERY.COM	JAMES BREMNER	914-345-0488
VERITAS TECHNOLOGIES LLC	2625 AUGUSTINE DR, SANTA CLARA, CA 95054	RAQUEL.ALONSO@VERITAS.COM	RAQUEL ALONSO	44 7710023463
VERNIER SOFTWARE & TECHNOLOGY LLC	13979 SW MILLIKAN WAY, BEAVERTON, OR 97005-2886	MGRIFFITHS@VERNIER.COM	MARIAN GRIFFITHS	503-277-2299
VIBRATEX	38 EXECUTIVE CT, NAPA, CA 94558-6267	EDDIE@VIBRATEX.COM	EDDIE ROMERO	707-226-8888
VORNADO AIR, LLC	415 E 13 TH ST, ANDOVER, KS 67002	RDICKERSON@VORNADO.COM	RACHEL DICKERSON	316-733-0035
VTECH TELECOMMUNICATIONS LTD	23F, BLOCK 1, TAI PING IND CTR57 TING KOK ROAD, TAI PO, HONG KONG, CHINA	ANITA_YIP@VTECH.COM	ANITA YIP	852-268-0100
WACOM TECHNOLOGY CORPORATION	1311 SE CARDINAL CT, PORTLAND, OR 97209	JEREMY.MARKER@WACOM.COM	JEREMY MARKER	360-896-9833
WHILL, INC	951 MARINERS ISLAND BLVD SUITE 300, SAN MATEO, CA 94404	RINA.ASANO@WHILL.INC	RINA ASANO	844-699-4455
ZEBRA TECHNOLOGIES CORPORATION	3 OVERLOOK PT., LINCOLNSHIRE, IL 60069	KESTER.MATTHEW@ZEBRA.COM	KESTER MATTHEWS	847-793-5986
ZIPPO MANUFACTURING COMPANY	33 BARBOUR ST, BRADFORD, PA 16701-1998	JSULLIVAN@ZIPPO.COM	JOHN SULLIVAN	814-368-2881

EXEMPT PRODUCER WHEN BATTERY STEWARDSHIP PLAN IS APPROVED

EXEMPT PRODUCER	BRAND NAME	PRODUCT NAME	BATTERY SUPPLIER
NOMO INTERNATIONAL	NOMO	NOMO SMART CARE	NEWLEADER BATTERY

BRANDS IN CALL2RECYCLE PROGRAM

3M
3M Peltor
3M Scott Fire & Safety
Ace
Acer
Adflo
ADI
Alber e-Fix
Alber e-Fix Eco
Alber e-Motion
Alber Scalamobil
Alber Smoov
Alber Twion
Albion
Alfa
Alienware
All-Clad
Altice
Amazon Basics
American Toppower
APC
Apower Electronics Co., Ltd
Aqua Joe
Aquatec Bath Lifts
Arlo
Armor All
Arris
Art's Energy
Astro
Asus
AT&T
Athena
Auto Joe
Away
Baby Shark
Babyliss
Balmuda
Batman
Battery Tender
Bayco

Beatsync
Best Buy essentials
BizTalk
Black & Decker
Blue
Blue Point
Blue Ridge
Bosch
Bostitch
Braava
Braun
Breathe Easy
Bren-Tronics Inc
BRIGHT HOUSE NETWORKS
Brother
Bubba
Cablevision
Canon
Carling Tech
Catepillar
CEL
Charter
Cisco
Cogeco
Coleman
Comcast
Conair
CopperTop
CORUN
Cosco
Cosco Kids
Cox Communications
Craftsman
CTL
Cub Cadet
Cuisinart
Cyclon
Datamax
DataSafe HX
DataSafe NPX

DCA
DCK
Dell
DENALI
DeWalt
Dewent
DG Home
Diehard
Dirt Devil
Do
Do it Best
DongCheng
Dorcy
Dorcy Industrial
Dorcy LifeGear
Dremel
Duracell
Duracell Activair
Duracell Coppertop
Duracell Coppertop Ultra Power
Duracell Mallory
Duracell Optimum
Duracell Plus
Duracell Power Pix
Duracell Prismatic
Duracell Procell
Duracell Quantum
Duracell Ultra
Duracell Ultra Advanced
Dynabook
Dynatel
Dynex
Dyson
Earthwise
Eaton
Eaton 3S
Eaton 5P
Eaton 5SC
Eaton 9PX
Eaton 9SX
Echo
EGO

Element
Ellia
ENDURA
Energizer
EnerSys
Epoch
Epson
Equate
E-Ready
Eveready
Everstart
Evolution Power Tools
Exmark
Facom
FiberSafe
Filtrete
Finish Thompson
Fitbit
Flame Glow
Flash
FLEX
Flex-Force
Fuji
FUJIAN SCUD POWER TECHNOLOGY CO.,LTD
FujiFilm
Gaomei
Gardenline
Garmin
Gateway
Generic
Genesis EP
Genesis NP
Genesis XE
Giinii
Go Direct (GDx)
Go Wireless (GW)
GoDaddy Poynt
GoFree Flex Pro
Goldtop
Google
Google Nest
GoPro

GP
Green Machine
Greenworks
Grilla
Hart
HD Supply
Hewlett Packard Enterprise
Hilti
Hitachi
HMDX
Home 360
HoMedics
Homeline
Honeywell
Honeywell Captuvo
Hong Kong Highpower
Hoover
HOOVER COMMERCIAL
Hooyman
HotShot
House of Marley
HP
HSM
HTC
HUI ZHOU DESAY BATTERY CO., LTD.
Husqvarna
Hustler
HVR-PWR
Hyper Tough
ICC-Nexergy, Inc
IE
IES
Infinity Labs
Insignia
Inspired
Inspired Energy
Intermec
InterMetro
Intex
Invacare Carroll Arro Series Beds
Invacare Carroll CS Series Beds
Invacare Colibri Series Scooters

Invacare I-Lift Series Lifts
Invacare Jasmine Patient Lifts
Invacare Lynx Series Scooters
Invacare POC1 Portable Oxygen Concentrator
Invacare Reliant Series Lifts
Invacare Roze Stand-Up Lifts
Invacare SOLO2 Portable Oxygen Concentrator
Invacare XPO2 Portable Oxygen Concentrator
IPC
i-Pro
Jam
Jaybird
JobSmart
John Deere
Jonsered
JVC
K2 Battery
KAN
Kenmore
Kensington
Kenwood
Keyence
Kindle E-Reader
Kindle Fire
Kirkland Signature
KitchenAid
kobalt
LabQuest
Laird
LaTrax
Lawnmaster
Leapfrog
Lego
LEGO Education
Lenovo
Leoch
Lexel
LG
LG Signature
LifeProof

Lithium Werks
Lively
LOGI
Logic Power
Logitech
Logitech G
Lucid Sound
M12
M18
M28
M4
Mac Tool
Magic Wand
Maglite
Mainstays
Makita
Martha Stewart
Mastercell
Mattel
MAX
Maxi Cosi
McCulloch
Measuring Tools
Media Com
MEDIACOM
Meguiar's
Metabo HPT
Mevo Inc.
MIDCONTINENT COMMUNICATIONS
Midland
MightCell
Milwaukee
Modal
Molicel
Monbebe
MOTIX
Motorola
Motorola Solutions
Mowox
MX Fuel
myCharge
National Power

Neptune
NETGEAR, Inc
Newleader
Nightstick
Nobles
NOKIA
Nook
Norbar
Nord-Lock
Northern Lights
NVIDIA Shield
O2Cool
Ocoopa
Odyssey
Olympus
OM Digital System
OM System
Omron
ONEPWR
Onesource
ONN
Oracle
Oral-B
Oreck
Oster
Otterbox
Pace
Panasonic
Peg Perego
Pelican
Pellenc
Philips
Pitney Bowes
Plantronics
Police Security
Poly
Polycom
PORTALAC
Porter Cable
Poulan Pro
Power Hawk
Power Joe

Power Sonic
PowerA
Powerex
PowerFlo
PowerGear
powerone
Power-Sonic
Powerworks
Poynt
PPS
Pro Batteries
Procter & Gamble
ProGuad 3
PROSeries
Proto
Psion
PYTES
Quite Space
Ray-Ban
Rayovac
RAZO/d'Action
Razor
RealSmart
REDLITHIUM
RedMax
Retissa Neoviewer
Ricoh
Ridgid
Robomow
Rocketfish Advanced
Rockwell
Rogers
Rongen
Ronson
Roomba
Rotozip
royal
RRC Power Solutions
RRC Power Solutions GmbH
Ryobi
Ryobi, Homelite
Safety 1st

Saitek
Samsung
Sanyo Energy
Sato Corporation
ScaleGard
Schneider
Scosche
Scott Safety
Scotts
Scud
SDI
Senco
SharkNinja
Sharp
Shaw
SHIMANO
SIGMA
Signature Care
Signature Select
SKIL
Skilsaw
Sky Rover
Snap-On
Snapper
SNOM
Snow Joe
Solimo
Sonos
Sony
Speedglas
Springer McGrath
Stanley
STIHL
Sudden link
Sun Gun
Sun Joe
Sunbeam
Sunbelt
Superbolt
Surface
SYLVANIA
Symbol

TCL
TEIG
TELUS
Tenergy
Tennant
Tera
Terra Sect
Texas Instruments
The Sharper Image
TI
Time Warner
TiVo
Tommy
TomTom
Tonies Box
Top End Force NRG
Top End Force RX Handcycle
Top Energy
Toro
Toshiba
Transource
Treva
Troy-Bilt
true
TruSen
Ultimate Ears
Ultra Steel
Ultrak
UltraLife
Uniden
Up & Up
V18
V28
Vacmaster

Vaio
Veritas
Versaflo
Videotron
VIVE
Vocollect
Vornado Air, LLC
VTech
Vuse
Wacom
Waring
Way to Celebrate
WDSS
Weedeater
WeWarm
WHILL Model C2/F series
Wizard of Oz
WorkTunes
Worx DIY
Worx Garden
WOW
XBox
Xfinity
Xplore
X-Talker
Yardworks
YUASA
YUVOLT
Zebra
Zippo

APPENDIX B - USDOT SPECIAL PERMIT 14849

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 <i>including lithium alloy batteries</i>	9	UN3090	N/A
Lithium ion batteries <i>including lithium ion polymer batteries</i>	9	UN3480	N/A
Lithium ion batteries contained in equipment <i>including lithium ion polymer batteries</i>	9	UN3481	N/A
Lithium ion batteries packed with equipment <i>including lithium ion polymer batteries</i>	9	UN3481	N/A

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

7. SAFETY CONTROL MEASURES:a. PACKAGING:

(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

July 23, 2020

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.

July 23, 2020

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.

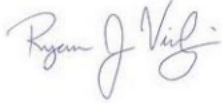
Under Title VII of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)—"The Hazardous Materials Safety and Security Reauthorization Act of 2005" (Pub. L. 109-59), 119 Stat. 1144 (August 10, 2005), amended the Federal hazardous materials transportation 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

July 23, 2020

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 Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

PO: Steve H

APPENDIX C - TERMINAL PROTECTION



Minimum Terminal Protection Guidelines SHIPPING IN CALL2RECYCLE BOXES

Below are the minimum requirements for preparing household batteries for shipment. When in doubt of the battery type, Call2Recycle® *recommends the battery be individually bagged or taped.*

BATTERY TYPE / CHEMISTRY	TERMINAL PROTECTION REQUIRED?
 <p>Rechargeable Nickel Cadmium (Ni-Cd) Nickel Metal Hydride (Ni-MH) Nickel Zinc (Ni-Zn)</p>	<p>9V or Less = NO (drop in the box)</p> <p>Greater than 9V = YES Terminal protection REQUIRED</p>
 <p>Primary (Select sites only) Alkaline & Carbon Zinc</p>	<p>12V or Less = NO (drop in the box)</p> <p>Greater than 12V = YES Terminal protection REQUIRED</p>
 <p>Rechargeable Small Sealed Lead Acid (SSLA/Pb) Lithium Ion (Li-Ion)</p>	<p>DAMAGED BATTERIES: Special U.S. DOT-approved packaging (not included here) for shipment required. Contact Customer Service at 877.723.1297 for assistance.</p> <p>All = YES Terminal protection REQUIRED</p>
 <p>Primary (Select sites only) Lithium Button/Coin Cell</p>	<p>Call2Recycle boxes should be shipped when full (66 lbs.) or within one year of the collection of the first battery.</p> <p>Store the Call2Recycle collection box in a cool, dry place and where it is under supervision.</p>

Charge Up Safety!
call2recycle.org/safety

Avoid the spark!

 = 

Battery terminals that touch metal surfaces or other batteries can spark, causing a fire or explosion.

Protect terminals before shipping
Bag or Tape Each Battery!

Place each battery into a clear plastic bag.

- Call2Recycle-provided bags
- Produce bags
- Newspaper bags
- Ziploc® bags


Clear bags only

If no bags are available, tape the positive (+) terminal with a non-conductive tape.

- Clear packing tape
- Electrical tape
- Duct tape

No masking tape *No Scotch® tape*
No painter's tape *Do not cover chemistry label*

(drop in the box)



REMINDER: Call2Recycle only accepts battery shipments in Call2Recycle boxes or those pre-approved by Call2Recycle. © 2017 Call2Recycle Inc. All rights reserved. 6/17

APPENDIX D – R2 CERTIFICATION


The current Call2Recycle R2V3 can be found at this [link](#).

APPENDIX E – SAMPLE PROGRAM MATERIALS

THE CALL2RECYCLE PROGRAM JOURNEY


What happens to your batteries when you recycle in DC?

IT STARTS WITH COLLECTIONS




RECHARGEABLE BATTERIES


Nickel (Ni)
Used Ni-Cd, Ni-MH and Ni-Zn batteries are recycled into new products such as silverware, pots & pans, golf clubs and new batteries.



Lithium (Li)
Used Li-Ion rechargeable batteries are recycled into steel, stainless steel and new batteries.




Lead (SSLA/Pb)
Used SSLA/Pb batteries are recycled into new Pb-based batteries.




SINGLE-USE BATTERIES

Alkaline
Used alkaline batteries are recycled into steel and new products such as sun screen and concrete aggregate.




Lithium Primary
Used Li-based primary batteries are recycled into new products such as silverware, stainless steel, golf clubs and new batteries.

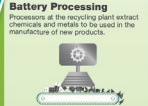


SORTING & PROCESSING

Battery Sorting
Collected batteries are sorted according to weight and battery type and sent to the recycling plant for processing.



Battery Processing
Processors at the recycling plant extract chemicals and metals to be used in the manufacture of new products.



Set your batteries on a journey of transformation into something new!

Learn more at call2recycle.org/dc and find a drop-off location near you at call2recycle.org/locator or 877-2-RECYCLE






Recycle Your Batteries HERE!



Make a difference by recycling your used batteries today.

ITEMS ACCEPTED FOR FREE RECYCLING:
Batteries weighing 11lbs. or less each

- Lithium Ion (Li-Ion)
- Nickel Cadmium (Ni-Cd)
- Nickel Metal Hydride (Ni-MH)
- Small Sealed Lead Acid (SSLA/Pb)
- Single-Use / Primary Batteries (GV, AA, AAA, etc.)

ITEMS NOT ACCEPTED FOR RECYCLING:

- ⊗ Wet Cell or Car Batteries
- ⊗ Batteries over 11 lbs.
- ⊗ Batteries over 300 watt hours

*Only GV = Ampere-Hours (AH) = Watt Hours (WH)

Visit www.call2recycle.org/dc

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Point of Sale Materials



APPENDIX F – EXAMPLE OF COLLECTION PARTNER SAFETY TRAINING

Call2Recycle logo

Charge Up Safety!
Call2Recycle® Collection Site Safety Training

1

What you will learn

2

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

3

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

4

What happens to a recycled battery?

5

Where does a used battery go?

6

Why you should care about battery safety

7

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

Accepted Rechargeable Batteries

8

For button batteries, you can make a "ravioli"

17

Do NOT use any of the following to protect battery terminals

18

Lithium-based batteries are the most popular battery today

19

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

20

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

21

What you need to know about collection boxes

22

How you prepare a box for shipping

23

Prepare the box

24

Call2Recycle accepts primary batteries each weighing less than 11lbs (5kgs)
Accepted Primary (Single-Use) Batteries

9

The following batteries are NOT accepted in Call2Recycle's traditional box program:

10

Battery terminals must be protected

11

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

12

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

13

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

14

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

15

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

16

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APPENDIX G – PROCESSOR HAZARDOUS WASTE PERMIT DETAILS

Processor Name	Battery Chemistry	Hazardous Waste Permit Type	Permit Number	Expiration Date
Cirba Solutions Recovery	Non-lithium	Hazardous Waste EPA ID#	MIK241575671	No Expiration
International Metals Reclamation Company (INMETCO)	Non-lithium and Ni-MH	Hazardous Waste EPA ID#	PAD087561015	No Expiration
Redwood Materials	Lithium, Lithium-ion, and Ni-MH	Hazardous Waste EPA ID#	NVD089924658	No Expiration
Cirba Solutions (BC)	Lithium	Operations Plan	RS-12978	No Expiration
Recycling Coordinators Inc. (RCI)	Lithium-ion and Ni-MH	Hazardous Waste EPA ID#	OHD986999480	No Expiration
Li-Cycle (NY)	Lithium-ion	Hazardous Waste EPA ID#	NYR00242891	No Expiration
Interco	Lithium-ion and Ni-MH	Hazardous Waste EPA ID#	ILR000151407	No Expiration
Evergreen Battery Recycling, LLC	Ni-MH and Ni-Cd	Universal Waste EPA ID#	OHR000033076	No Expiration
Cirba Solutions (OH)	Ni-Cd	Hazardous Waste EPA ID#	OHD071654958	No Expiration
Gopher Resources	SSLA	Hazardous Waste EPA ID#	MND006148092	No Expiration
Doe Run Co	SSLA	Hazardous Waste EPA ID#	MOD059200089	No Expiration