



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

Revised: August 24, 2015

Submitted by:

Carl Smith
President and CEO
Call2Recycle, Inc.
1000 Parkwood Cir Ste. 200
Atlanta, GA 30339
csmith@call2recycle.org
www.call2recycle.org

Submitted to:

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





Table of Contents

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



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



I. Introduction

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

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

A. Vermont Primary Battery Law

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

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

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



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

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

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

B. Citations

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

II. Stewardship Organization

A. Statutory Citation

10 V.S.A. § 7581. DEFINITIONS

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

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

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

B. Call2Recycle, Inc.

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

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



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

C. Management and Administration

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

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

III. Registered Manufacturers and Brands

A. Statutory Citation

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

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



B. Primary Battery Producers and Brands

As of the submission of this stewardship plan, 19 primary battery producers representing 70+ brands, will finance Call2Recycle’s primary collection and recycling program in Vermont. These producers support Call2Recycle by paying fees based on the total weight of primary batteries sold into Vermont to cover the total cost of primary battery collections and the recycling program in the state.

Call2Recycle is funded from three Industry Steward Fees:

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

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

C. Free Collection

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

IV. Collection, Convenience and Implementation

A. Statutory Citation

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

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

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



- (A) Allow all retailers who meet requirements specified in the plan, all municipalities, and all certified solid waste management facilities to opt to be a collection facility.
 - (B) Provide, at a minimum, no fewer than two collection facilities in each county in the State that provide for collection throughout the year.
 - (C) Provide for the acceptance from a consumer of up to 100 batteries per visit. A collection facility may agree to accept more than 100 batteries per visit from a consumer.
- (9) *Implementation. A producer or a primary battery stewardship organization shall include provisions in the plan for the implementation of the program in conjunction with those retailers, municipalities, and certified solid waste management facilities acting as collection facilities under a program. No transportation or recycling cost shall be imposed on retailers, municipalities, or certified solid waste management facilities acting as collection facilities under a program. A producer or a primary battery stewardship organization shall provide retailers, municipalities, and certified solid waste management facilities acting as collection facilities products or equipment for setting up a collection point and for providing for the pickup of collected primary batteries, including arranging for the management of those primary batteries.*

B. Collection

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

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

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

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

- ✓ Agrees to accept up to 100 primary batteries per visit from a consumer with each battery weighing less than 11 pounds. Should a consumer drop off a large quantity of batteries, the collection site is still responsible for ensuring that all applicable chemistries have the appropriate terminal protection; these details will be explicitly covered in both training materials and "on-board" process.
- ✓ Agrees to provide contact information for individual sites



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

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

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

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

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



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

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



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

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



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

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

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

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

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

The program will not ship any used batteries to a sorter or processor that has not been qualified by Call2Recycle under its strict qualification standards (*see Appendix H*). Processors are selected through a fair and transparent



process that requires compliance with applicable environmental, health and safety and transportation regulations. Processors will also be expected to have industry recognized recycling certification(s) and audit processes in place. Some examples are noted below:

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

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

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

C. Convenience

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

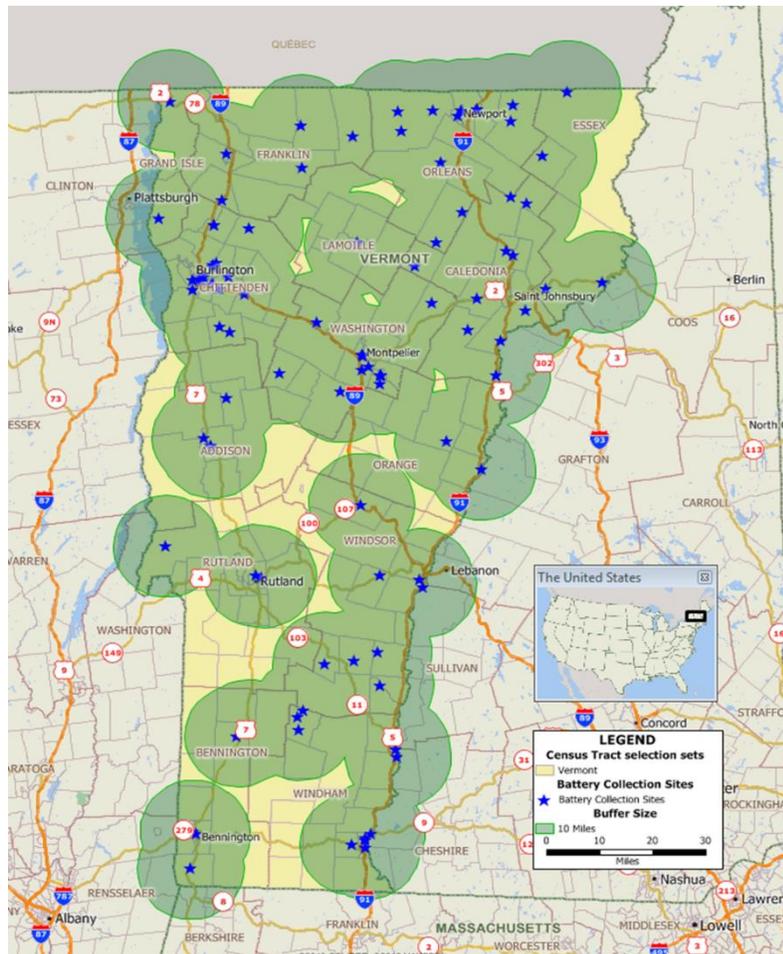


Figure 1: Active collection network in the state of Vermont for rechargeable batteries. All sites mapped are available to take batteries from consumers

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



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

Figure 2: Number of collection facilities per county

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

D. Implementation

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

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



This will be done through the following methods:

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



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



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

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

V. Transportation and Recycling

A. Statutory Citation

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

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



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

B. Roles and Responsibilities

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

Sorting and Recycling Contractors

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

State Government

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

Local Government

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

Consumer or End User

Consumers are responsible for delivering designated batteries to collection points.

Call2Recycle, Inc.

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

C. Transporters

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

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



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

D. Processing Facilities

| Recycling Facility | Contact Information | Description of Work |
|--|--|---|
|  | <p>INMETCO Albert Hardies One Inmetco Dr. Ellwood City, PA 16117 724-758-2830 www.inmetco.com</p> | <p>INMETCO is a leading recycler of metal bearing wastes in North America. Currently, all used primary batteries collected under the Call2Recycle program in the United States are sent to INMETCO. Call2Recycle will continue using INMETCO to sort and process its batteries.</p> |

Call2Recycle currently sends all chemistries of primary batteries for processing to INMETCO (Ellwood City, PA) which is a fully permitted U.S. Environmental Protection Agency (EPA), Resource Conservation and Recovery Act (RCRA) facility with a Part-B Storage Permit and a Pennsylvania hazardous waste treatment, storage and disposal (TSD) Permit.

INMETCO, who utilizes a rotary hearth and an electric arc furnace for thermal metal reclamation, has been Call2Recycle’s primary battery processor since the organization first formally began collecting primary batteries in 2010. It was selected for three reasons, listed in no particular order: its recycling efficiency rate (RER), its “cradle-to-cradle” approach to reclaiming zinc, and its cost.

First, INMETCO currently attains an 84% (using a “dry” process) RER, which significantly exceeds the prevailing global standard of 50%, as decreed by the EU. Even in Ontario Canada, where the most stringent standard of 80% is used, INMETCO exceeds it.

Second, 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.

Finally, INMETCO has historically been the most cost effective option in North America, balancing the cost of processing with its overall performance.



Call2Recycle continuously monitors and evaluates the efficiency and quality of INMETCO’s reclamation process as well as other potential primary battery processors. INMETCO 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 INMETCO by major generators of batteries that want assurance that their batteries are properly disposed. All consolidation, sorting and processing facilities are open to inspection and audit. The most recent environmental audit summary for INMETCO is *Appendix M*.

INMETCO processes Lithium Primary, Alkaline, Carbon Zinc and a majority of button and coin cells collected by the Call2Recycle program. Below are flow charts (*Figure 3*) that detail how these are handled at INMETCO.

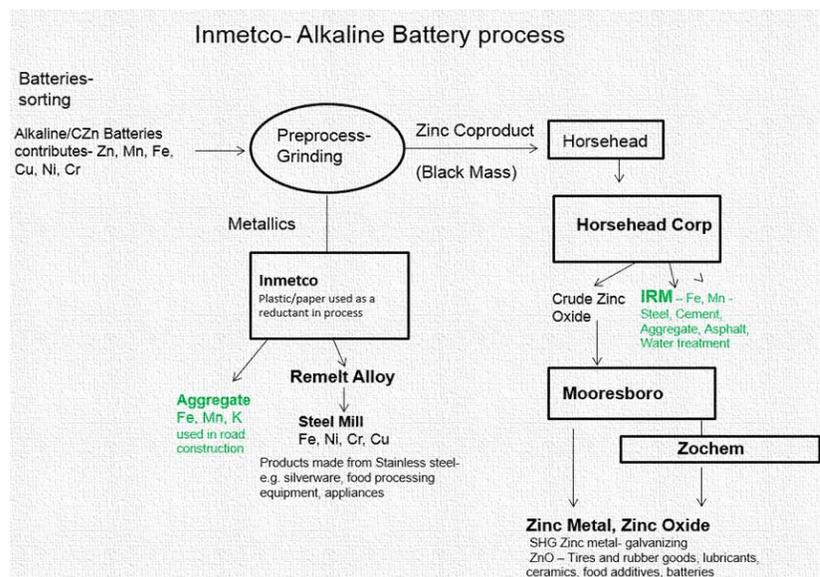
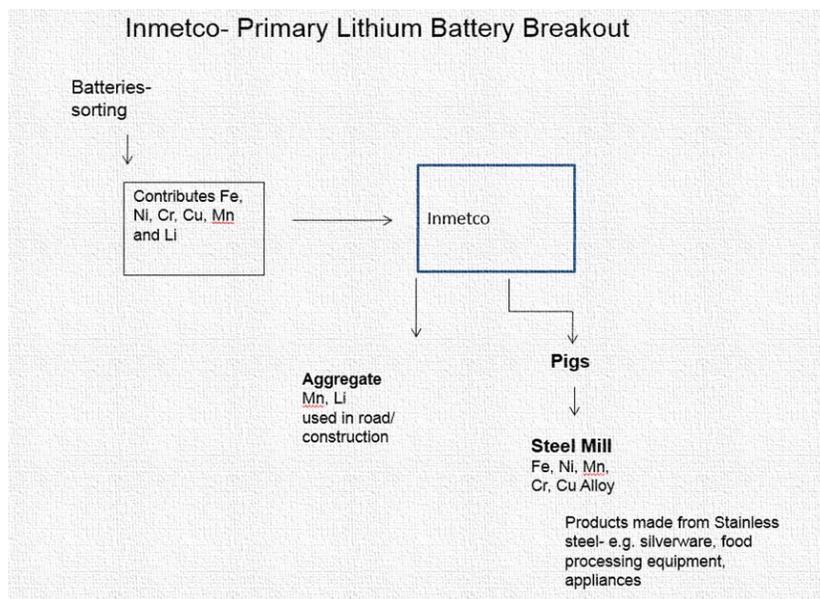


Figure 3: INMETCO Battery Processes



In addition, Call2Recycle routinely evaluates the efficiency and quality of its partner's battery sorting and reclamation capabilities. To that end, Call2Recycle, Inc., issued a Request for Proposals (RFP) in February 2015 for sorting and processing of used batteries collected through its network of collection sites, including batteries collected in Vermont.

Call2Recycle, Inc. is currently in the process of qualifying Battery Solutions, LLC as a sorter and processor for primary batteries collected in Vermont. To learn more about Battery Solutions, LLC, please visit - <http://www.batteryrecycling.com>.

Should there be any change or addition to Call2Recycle's network of sorters and processors, Call2Recycle, Inc. will provide the State of Vermont with proper notice and revise this Plan should it be deemed necessary by the Secretary.

E. Safety and Compliance

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

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

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

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

F. Training

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



Educating and training collection sites on safe and compliant handling and shipping of batteries begins when new locations are enrolled, continues consistently throughout the first year and is ongoing as there are changes to Federal and State regulations, battery chemistries and as needed based on individual site needs. Call2Recycle's website is a great resource for collection sites and consumers to obtain information and best practices, download instructional flyers or watch a video related to handling and shipping of batteries. See *Appendix N* for examples.

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

More particulars about training:

- Call2Recycle uses an aggressive on boarding process to ensure that newly enrolled locations are trained and actively participate in the battery collections program. Once enrolled, each new site receives up to 5 check-ins during the first year. Details of Call2Recycle's on boarding process can be found in *Appendix D*.
- After their initial year in the program. Call2Recycle contacts sites, minimally twice a year, to review program specifics, shipping and compliance and how the program is working for them. This may be done via phone, email or in-person site visits.
- Non-compliant or non-program incidents are recorded at the time the receipt is processed. Incident reports (*Appendix O*) are reviewed daily by Call2Recycle's Safety and Compliance Manager. Incidents are recorded for each individual collection site and contacted by email and/or phone to advise them of the issue. In case of a repeat offender the site may be suspended from receiving supplies until the appropriate training and/or other corrective action has taken place.
- Bulk shipments can be scheduled on-line with the use of a program that assists in utilizing the correct language that is monitored by the DOT (*excerpt from instruction document- Appendix P*). This on-line tool has multiple checkpoints for the collection site to indicate that their battery shipment is in compliance. For example, the user would be asked to confirm that "none of these batteries are recalled, defective or damaged, as they would require special attention."
- Regularly provide program participants with safety updates to maintain DOT compliance. Updates are communicated over a period of time and in multiple ways such as outreach calls, emails, newsletters, print materials and webinars.
- Given the amount of instruction and information shared, Call2Recycle employees are mandated to go through quarterly safety and compliance training to maintain a high degree of knowledge.





VI. Education and Outreach

A. Statutory Citation

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

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

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

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

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

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



B. Strategic Approach

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

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

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

Messaging

The program strategy will utilize three concise messages:

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

Three-Phase Approach

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

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

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



Target Audiences

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



Samples of Call2Recycle marketing materials are in Appendix Q.

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

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

Pre-launch Objectives

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

Key Tactics & Deliverables

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



- A printed and digital welcome & launch kit will be distributed providing general information on the Call2Recycle program in Vermont (also available on the Vermont-specific landing page) and will include materials such as: fact sheet, FAQs, collateral (signage and handouts), and promotional items such as newsletter text, web banners, social media content, etc...
- Call2Recycle's best-in-class customer service team will be available via a toll-free information line (1-877-723-1297) to engage collection sites, support inquiries and process orders for collection materials.
- Residents and Stakeholders: to tease the upcoming program prior to the 2016 launch, Call2Recycle will:
 - Highlight the upcoming program in the Call2Recycle monthly newsletter as a Q & A (November 2015 and December 2015 edition) – current subscription is 12,000
 - Highlight the program via Call2Recycle social media channels (Twitter and Facebook) by working into the monthly cadence (twice a month throughout November and December 2015)
 - Implement media relations outreach designed to educate local media about the new program; secure at least two news stories in November and December (broadcast and/or print)
- To benchmark current consumer awareness of battery recycling in Vermont, Call2Recycle will utilize an Omnibus survey. This survey will be conducted 2x/year – January and December – as an additional measurement to gauge effectiveness of education and outreach initiatives.

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

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

Key Tactics & Deliverables

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



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



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

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

Ongoing Objectives

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

Key Tactics & Deliverables

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



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

VII. Producer to Producer Reimbursement

A. Statutory Citation

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

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

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

§ 7589. REIMBURSEMENT; AUTHORIZATION

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

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

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

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

§ 7590. REIMBURSEMENT PROCESS

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



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

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

B. Producer Participation and Reimbursement

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

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

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

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



- Chemistry
- Brand
- Manufacturer and manufacturer location

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

VIII. Collection Rate Performance Goals

A. Statutory Citation

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

- (a) *Primary battery stewardship plan required. On or before June 1, 2015, each producer selling, offering for sale, distributing, or offering for promotional purposes a primary battery in the State shall individually or as part of a primary battery stewardship organization submit a primary battery stewardship plan to the Secretary for review.*
- (8) *Performance goal; collection rate. A primary battery stewardship plan shall include a collection rate performance goal for the primary batteries subject to the plan. The collection rate includes the estimated total weight of primary batteries that will be sold or offered for sale in the State by the producer or the producers participating in the primary battery stewardship plan.*

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

B. Collection Rates

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

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



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

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

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

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

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

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



Figure 4: Five Year Collection Rate Forecast



IX. Annual Report and Plan Audit

A. Statutory Citation

§ 7585. ANNUAL REPORT; PLAN AUDIT

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

B. Annual Report

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

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



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

C. Plan Audit

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



X. Appendices

A. Board of directors



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

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



Call2Recycle Officers



Carl Smith
President and CEO



Linda Gabor
Vice President, Marketing &
Customer Service



Greg Broe
Vice President, Finance &
Administration



Leo Raudys
Vice President of Program
Development



Executive Director Canada



B. Participating Producers

| Name | Brands | Address | Contact Information |
|--|---|--|---|
| Ace Hardware Corporation | ACE | 2200 Kensington Court Oak Brook, IL 60523 | Heather Buck 630-990-3154 hbuck@acehardware.com |
| Delhaize America (Hannaford Supermarkets) | Home 360 | 2110 Executive Dr. Salisbury, NC 28147 | George Parmenter 704-633-8250 george.parmenter@delhaize.com |
| Do It Best | Do It Best | 6502 Nelson Rd Fort Wayne, IN 46803 | Steve Markley 260-748-5500 Steve.markley@doitbest.com |
| Dollar General | DG Home | 100 Mission Ridge Goodlettsville, TN 37072 | Nina Burse 615-855-4683 nburse@dollargeneral.com |
| Dorcy International, Inc | Dorcy, Dorcy Industrial, Mastercell, Diehard | 2700 Port Rd Columbus, OH 43217 | Kathy Venhoeven 614-333-1016 kathy@dorcy.com |
| Duracell/The Gillette Company/Proctor & Gamble | Duracell, Duracell Ultra, Duracell Coppertop, Duracell Procell, Duracell Activair, Duracell Coppertop Ultra Power, Duracell Mallory, Duracell Power Pix, Duracell Prismatic, Duracell Quantum, Duracell Ultra Advanced | One Gillette Park South Boston, MA 02127 | Steven Wicelinski 203-731-6406 wicelinski.sp@pg.com |
| Energizer Battery Manufacturing, Inc | Energizer, Energizer Max, Energizer Ultimate, Energizer eco advanced, Energizer advanced, Energizer Industrial, Eveready, Eveready Gold, Eveready Super Heavy Duty | 25225 Detroit Rd Westlake, OH 44145 | Marc Boolish 440-835-7659 marck.boolish@energizer.com |
| General Wireless Operation, Inc. (Formerly RadioShack) | RadioShack, RadioShack Extended Life | 300 RadioShack Cir Fort Worth, TX 76102 | Dwayne Campbell 817-415-3203 dwayne.campbell@radioshack.com |
| GP Batteries International Limited | GP, Gold Peak, GP Super, GP Ultra Plus, GP Ultra, GP Supercell, GP High Voltage, GP Greencell | 8370 NW 66th St Miami, FL 33166 | Harold Decker 858-674-6099 harold_decker@goldpeak.com |
| Interstate Batteries Recycling, LLC | Interstate, Workaholic, PowerVolt, Power Patrol | 12770 Merit Drive Dallas, TX 75251 | Dan Lane 972-715-6672 dan.lane@ibsa.com |



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



C. Locator

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

YOU ARE HERE: HOME / BATTERY & CELLPHONE RECYCLING LOCATIONS Print | Email | Link to this page

FIND RECYCLING LOCATIONS

LOCATIONS WITHIN ▼

OF

SEARCH

Participating Vendor

RECYCLE ON THE WAY

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

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

FROM:

TO:

PLAN YOUR TRIP

© OpenStreetMap contributors

12 Locations Near You

Viewing 1-6 of 12 results Page 1 of 2

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





D. New Enrollment On boarding

Recharging the planet. Recycling your batteries.™



2015 Outreach for New Enrollments

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

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

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



E. Collection materials and collaterals – new enrollment email

Hello new Vermont collection site,

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

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

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

The below is in an attachment to the new enrollment email

Welcome to Call2Recycle®

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

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

Frequently Asked Questions

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



The Collection Kit

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

| | |
|---|--|
| <p>Collection box with self-adhesive plastic bags for safe battery recycling. The box comes in small and large sizes.</p> | <p>Program guidelines with instructions for box assembly, shipping and battery handling.</p> |
|---|--|



| | |
|---|--|
| <p>An 8.5x11 poster that you can use to help inform others that you recycle batteries and cellphones.</p> | |
|---|--|



What Can I Collect?
 The Call2Recycle consumer batteries and cellphones in brief overview of the power various

program collects all (up to 11 lbs. each) Vermont. Below is a types of batteries that electronic products.

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



Collection materials and collaterals, continued – collection box insert



Recharging the planet. Recycling your batteries.™

LARGE BOX: BATTERY AND CELLPHONE PROGRAM GUIDELINES

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

STEP 1: WHAT CAN BE ACCEPTED FOR RECYCLING?

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

Batteries NOT Accepted: wet-cell or over 11 lbs

STEP 2: BUILD THE BOX



Remove shrink wrap. Pull and lift front flap.

STEP 2: (CONT'D)



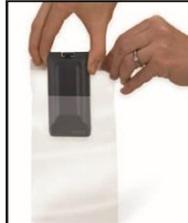
Insert header tabs into top slots and side flaps into back slots. Ensure bags are neatly positioned.

STEP 3: DATE & DISPLAY



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

STEP 4: BAG IT...



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

SEAL IT...



Remove plastic strip from top of bag and seal.

DROP IT!



Deposit sealed bag into the box.

STEP 5: SECURE BOX



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

STEP 6: PREPARE SHIPMENT



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

ADDITIONAL INFORMATION

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

Contact Us:
 Online at call2recycle.org
 Email: customerservice@call2recycle.org
 Phone: 877.723.1297



© 2014 Call2Recycle® All Rights Reserved.



Collection materials and collaterals, continued- collection box insert



Recharging the planet. Recycling your batteries.™

Dear Call2Recycle Program Participant:

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

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

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

Safety & Compliance

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

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

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

Carl Smith
President/CEO
Call2Recycle®



Collection materials and collaterals, continued- collection box insert



Recycle Your Batteries **HERE**



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

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

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



For more information
visit call2recycle.org or call 877.2.RECYCLE



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

June 30, 2015



U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety Administration

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

DOT-SP 14849
(FOURTH REVISION)

EXPIRATION DATE: December 31, 2015

(FOR RENEWAL, SEE 49 CFR § 107.109)

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



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

Page 2

June 30, 2015

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

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

6. HAZARDOUS MATERIALS (49 CFR § 172.101):

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



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

Page 3

June 30, 2015

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

7. SAFETY CONTROL MEASURES:

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

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

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

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

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

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



8. OPERATIONAL CONTROLS:

- a. The grantee must provide each person who packages materials in boxes subject to this special permit detailed instructions on the requirements of the special permit and packaging batteries for transport. The instructions must be displayed where the packages are closed for transportation and must at a minimum communicate each requirement of paragraph 8.b. through 8.h. and 9.c. of this special permit.
- b. This packaging is to be used only authorized for battery disposal or recycling purposes.
- c. Lithium metal batteries transported in this packaging are limited to 25 grams of lithium per battery. Lithium ion batteries are limited to 300 Watt-hours. Non-spillable batteries are limited to 25 pounds or less gross weight each.
- d. Lithium ion, lithium metal, non-spillable batteries and dry cell batteries (dry cell batteries with a marked rating over 9 volts and alkaline batteries with a marked rating over 12 V) must be protected against short circuits. Some suitable methods of protection the batteries against short circuits include, but are not limited to, placing the batteries in individual plastic bags; or taping and covering the exposed terminals. The means of protection used to prevent short circuits must remain in place while the packages are in transportation.
- e. Electrical devices must be protected against short circuits and unintentional activation.
- f. The gross weight of the package may not exceed 30 kg (66 pounds).
- g. Packages must be stored away from heat.
- h. Each package must be securely closed prior to being offered for transportation.
- i. When utilized as specified in these instructions, the completed package is excepted from the requirements of Subparts C, D and E of Part 172 (shipping papers, marking and labeling respectively).



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

Page 5

June 30, 2015

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

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

9. SPECIAL PROVISIONS:

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

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

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

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

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



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

Page 6

June 30, 2015

- f. The grantee must keep on file and make available upon request annual reports from box inspections conducted at locations where batteries are consolidated and/or processed. These reports must include all noted non-compliance with the HMR and/or this special permit and actions taken to prevent recurring of such non-compliance.
- g. A list of companies that have been provided these packagings must be maintained and made available upon request.
10. MODES OF TRANSPORTATION AUTHORIZED: Motor Vehicle and Cargo Vessel. Cargo vessel is authorized only to and from Alaska, Hawaii, Guam, Puerto Rico and the Virgin Islands.
11. MODAL REQUIREMENTS: None, as a requirement of this special permit.
12. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this special permit and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:
- o All terms and conditions prescribed in this special permit and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
 - o Persons operating under the terms of this special permit must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.
 - o Registration required by § 107.601 et seq., when applicable.

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

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



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

Page 7

June 30, 2015

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

Issued in Washington, D.C.:

Siane LaValle

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

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

Copies of this special permit may be obtained by accessing the Hazardous Materials Safety Homepage at http://hazmat.dot.gov/sp_app/special_permits/spec_perm_index.htm
Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

PO: LAVALLE/SG



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

Call2Recycle Physical Flow: United States



COLLECTION

Public Agencies
Retailers
Businesses
Municipalities



SORTING

Recording and sorting by chemistry

INMETCO Ellwood City, PA



PROCESS & RECOVERY

Processed by chemistry type

Single-Use Batteries

INMETCO

Ellwood City, PA

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



H. Processor and sorting qualification standards

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

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

Processor Standards

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



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

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

Receiving, Sorting and Consolidation Standards
Include the above requirements (Except 9C and 14)



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



I. R2 2013 certificate



PERRY JOHNSON REGISTRARS, INC.

Certificate of Registration

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

Call2Recycle, Inc.

1000 Parkwood Circle, Suite 200, Atlanta, GA 30339 United States

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

Responsible Recycling® (R2) Rev. 7/2013

This Registration is in respect to the following scope:

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

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

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



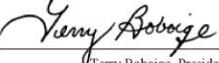
PERRY JOHNSON
REGISTRARS, INC.



Responsible Recycling
R2
Perry Johnson Registrars, Inc.



ANAB
ACCREDITED



Terry Boboige, President

Perry Johnson Registrars, Inc. (PJR)
755 West Big Beaver Road, Suite 1340
Troy, Michigan 48084
(248) 358-3388

The validity of this certificate is dependent upon ongoing surveillance.

| | | |
|---|--|--|
| <i>Effective Date:</i> December 22, 2014 | <i>Expiration Date:</i> December 21, 2017 | <i>Certificate No.:</i> C2014-02500 |
|---|--|--|



J. ISO 14001 certificate



PERRY JOHNSON REGISTRARS, INC.

Certificate of Registration

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

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

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

ISO 14001:2004

This Registration is in respect to the following scope:

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

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







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

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

The validity of this certificate is dependent upon ongoing surveillance.

| | | |
|---------------------|------------------|------------------|
| Effectiveness Date: | Expiration Date: | Certificate No.: |
| October 8, 2014 | October 7, 2017 | C2014-02502 |



K. OHSAS 18001 certificate



PERRY JOHNSON REGISTRARS, INC.

Certificate of Registration

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

Call2Recycle, Inc.

1000 Parkwood Circle, Suite 200, Atlanta, GA 30339 United States

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

OHSAS 18001:2007

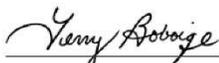
This Registration is in respect to the following scope:

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

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



UKAS
MANAGEMENT
SYSTEMS



Terry Boboige, President
Perry Johnson Registrars, Inc. (PJR)
755 West Big Beaver Road, Suite 1340
Troy, Michigan 48084
(248) 358-3388

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

The validity of this certificate is dependent upon ongoing surveillance.

| | | |
|-----------------|------------------|------------------|
| Effective Date: | Expiration Date: | Certificate No.: |
| October 8, 2014 | October 7, 2017 | C2014-02503 |



L. List of collection sites

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



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



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



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



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



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



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



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



| Account Name | Address | County | Contact Information | Open to consumers for drop off |
|---|--|---------|---|--------------------------------|
| Londonderry Solid Waste Group | 100 Old School St South Londonderry, VT 05155-9285 | Windham | Fishman, Esther 8028243356 londonrecycle@vermontel.net | Yes |
| Brown & Roberts Ace Hardware | 182 Main St Brattleboro, VT 05301- 2892 | Windham | Store Manager (802) 257-4566 | Yes |
| Londonderry Hardware | 5700 VT Route 100 Londonderry, VT 05148-9537 | Windham | Store Manager (802) 824-3926 | Yes |
| Londonderry Transfer Station | 7060 Route 100 Londonderry, VT 05148-9555 | Windham | Esther (802) 824-5506 | Yes |
| Rockingham Recycling Ctr | 7446 US Route 5 Westminster, VT 05158-9680 | Windham | Mary O'Brien (802) 463-9219 | Yes |
| Greater Upper Valley Solid Waste District | 96 Mill Street North Hartland, 05052 | Windsor | Hurd, John (802) 296-3688 | Yes |
| Woodstock Ace Hardware | 452 Woodstock Rd Woodstock, VT 05091- 9759 | Windsor | Store Manager (802) 457-3291 | Yes |
| Hartford Recycling Center | 2590 N Hartland Rd White River Junction, VT 05001-9819 | Windsor | Stockman, Wanda 8022955740 WStockman@Hartford-VT.org | Yes |
| VA Medical Center (138) | 215 N Main St White River Junction, VT 05009-0001 | Windsor | Rowland, Mary 8022959363 marykelly.rowland@va.gov | No |
| Springfield Transfer Station-Hwy Garage | 216 Fairground Rd Springfield, VT 05156- 2140 | Windsor | Dan Farrar (802) 885-5827 | No |
| Bethel/Royalton Transfer Station | 122 Waterman Rd South Royalton, VT 05068-5286 | Windsor | Brown, Chet 8027632232 solidwaste683@yahoo.com | Yes |
| Ludlow Transfer Station | 336 Route 100 S Ludlow, VT 05149-9510 | Windsor | Mary O'Brien (802) 228-2846 | Yes |
| Cavendish Recycling Facility | 354 Route 131 Cavendish, VT 05142 | Windsor | Mary O'Brien (802) 226-7743 | Yes |
| Chester-Springfield Recycling Ctr | 135 Fairground Rd Springfield, VT 05156- 2114 | Windsor | Mary O'Brien (802) 885-5827 | Yes |
| Weathersfield Recycling Center | 5024 Route 106 Perkinsville, VT 05151 | Windsor | Mary O'Brien (802) 263-5651 | Yes |



M. INMETCO audit summary

Version 03/25/2015

ENVIRONMENTAL AUDIT INFORMATION

INMETCO® (The International Metals Reclamation Company, Inc.)

One Inmetco Drive, Ellwood City, PA 16117

(724) 758-5515 Fax (724) 758-2837

Website – www.inmetco.com

Inmetco is located in Western Pennsylvania, north of Pittsburgh and south of New Castle in Lawrence County. The Inmetco property once was the site of U.S. Steel's National Tube Works manufacturing facility that operated from the early twenties to the early seventies. The construction of INMETCO began in 1976, with operations commencing in late 1978. The main facility is housed in one building being 3.2 acres, under roof, where the storage and processing of feed material is conducted. The active portion of the TSD function is approximately 12 acres of the 92 acres INMETCO owns.

1. RCRA Permit Numbers

Inmetco is a US EPA RCRA regulated as a TSD for the storage of hazardous waste. The process is an EPA RCRA exempt secondary metals reclamation operation, which reclaims nickel, chromium and iron from hazardous and nonhazardous wastes. Our process uses the only smelting furnace in North America dedicated to the recovery of nickel, chrome and iron, while producing a stainless steel remelt alloy used by virtually all of the domestic specialty steel manufacturers plus customers in Canada, Europe, China and Asia.

Inmetco is a wholly owned subsidiary of Horsehead Holding Corp., DB# 609074703, which is one of the world's largest zinc producing companies. The Ellwood City, Pennsylvania facility operates a commercial recycling, RCRA Part-B permitted hazardous waste facility. Inmetco received its Part-B Hazardous Waste Storage Permit #PAD087561015 from the Pennsylvania Department of Environmental Protection (PA-DEP) on November 6, 1992, and was revised and reissued on December 14, 2006 and it expires on July 14, 2016. Inmetco is under the jurisdiction of the Meadville regional office: 230 Chestnut Street, Meadville, Pennsylvania 16335-3494; general phone number (814) 332-6848; Dept. of Solid Waste (814) 332-6848, Mr. Chuck Byham is the PADEP contact person.

Inmetco also has air permits with PA-DEP, Bureau of Air Quality for the following areas: Rotary Hearth Furnace Baghouse, Electric Arc Furnace Baghouses, Cadmium Recovery Baghouse, Pelletizing Disc, Sludge Dryer, Raw Material Feed Preparation and Calcine Thermal Oxidizer. The individual source permits have been umbrellaed through issuance of the PADEP Title V Operating Permit, #37-00243. The Company has a wastewater treatment plant to handle contact waters from the process. The process water is under a permit-by-rule standard. Inmetco has a pretreatment agreement with the Ellwood City Sewage Treatment Authority for pH, temperature and metals.

2. Waste Analysis Plan Program for Incoming Hazardous Wastes

Before any wastes are accepted, they must first pass a prescreen analysis through Inmetco's lab. Only pre-authorized wastes can be shipped to Inmetco. Before processing, all feedstocks are again analyzed and compared to the prescreen analysis. Any significant deviation from the prescreen analysis, without prior approval, may result in the rejection of the material. Rejected material is returned to the generator at their expense or, if processed, additional fees may adjust it. The Marketing and Sales Department monitors this function.



Version 03/25/2015

10. Environmental Monitoring (i.e. Groundwater and Air Monitoring)

INMETCO conducts no groundwater monitoring because all wastes are stored in tanks or containers inside roofed buildings. The tanks or containers have walls on all sides and a minimum of 6" of sealed concrete, with a 30-mil PVC liner as per PA regulation 25§75.264 (b) (3).

Air emissions are monitored by process controls and settings. Stack tests are conducted as requested by the PA-DEP, or for permit renewals. The stacks are permitted for total particulate, NOx VOC's and visible emissions.

There are no known drinking water wells within 1/4 mile of the facility. Both Ellwood City and the Borough of Ellport have city water systems that draw water from the Slippery Rock Creek located 1/2 mile upstream of the INMETCO facility.

The local groundwater flow system is primarily controlled by topography. There is no known use of the groundwater in the vicinity of the INMETCO plant. The Homewood Sandstone is the first continuous water-bearing zone underlying the site and it represents an unconfined aquifer at this location. The hydraulic gradient in this aquifer is almost flat in the immediate vicinity of the facility but steepens rapidly toward the sandstone outcrop along the banks of the Connoquenessing Creek to the north of the site. The uppermost-unconfined aquifer (depth is between 30 and 36 feet) flows north-northeast toward the Connoquenessing Creek.

11. Underground Tanks

INMETCO has no underground tanks. There has been remediation of (2) underground fuel tanks (one in March of 1991, the other in September of 1990. Both tanks were left from previous owners. The tanks were removed, cleaned, cut up and sold as scrap metal.

The PA-DEP has not required any groundwater monitoring for these tanks.

12. Disposal of Baghouse Dust ,WWTP Filter Cake Containing Zinc, Lead, and Cadmium

At present, INMETCO's zinc, lead and cadmium by-product is manifested as K061 and sent to Horsehead Corp., Inc., 900 Delaware Avenue, in Palmerton, Pennsylvania 18071 (EPA I.D. No. PAD002395887), a reclaimer of zinc, lead and cadmium. Ms. Mary Wingert, Manager Steel and Industry Services at 610.826.8986, is the contact person at Horsehead Corp.

13. Liquid Processing - Wastewater Permits

INMETCO conducts no acid neutralization. Acidic liquids and spent metal-bearing solutions are used on the pelletizing disc to make pellets. INMETCO sends its treated wastewater blow down to the Ellwood City Public Treatment Owned Works (NPDES #PA0026832) under a pre-treatment agreement with the City it was effective August 1, 2003; and it expires on December 31, 2017. Contact can be made with the facility by calling (724) 758-4749. The discharge water to the city is between 0 and 60,000 gallons/day. Inmetco has never caused a violation at the sewage treatment plant. *Inmetco has had zero discharge of any process water since November 2010.*

14. Residual Waste Report

Available on the PADEP website at <http://www.dep.state.pa.us>. Go to Efacts, : <http://www.ahs.dep.pa.gov/eFACTSWeb/default.aspx>



Version 03/25/2015

15. Notices of Violations - NOV's

A complete list of all of Inmetco's NOV is attached as separate document. (inclusive of the years 1999 through 2013 YTD). See attached compliance history. Facility information can be verified through the PADEP website at [<http://www.dep.state.pa.us/efacts/>]

16. Storm Water.

INMETCO was issued a General Permit for discharge of its storm water from industrial activities on November 6, 1992 (Permit Number PAR208329). Requirements of the Permit are to monitor and report Appendix B parameters (metals) every 6 months. The Permit was issued on March 01, 2012 and expires at midnight February 28, 2017. INMETCO's storm water discharges into the Connoquenessing Creek. The confluence of the Slippery Rock and Connoquenessing Creeks is approximately one-half mile to the west, upgradient of the facility. The Slippery Rock Creek, which is 1/2 mile upstream from INMETCO, is the source of city water for Ellwood City and the Borough of Ellport. The INMETCO plant is on the city water system, operated by the West Penn Water Co. for portable water and fire protection. There are no known private or public drinking water wells within a 1/2 mile of INMETCO.

17. Geology of the INMETCO Facility

The INMETCO facility is situated on a low-relief upland area at an approximate elevation of 915± feet. The Connoquenessing Creek, which flows around the site, is situated approximately 900 feet north of the facility at an approximate elevation of 780 feet, and 1,600 feet south of the facility at an elevation of approximately 830 feet. The river has a very narrow floodplain and very steep slopes, which range from 50 to 75 percent. Therefore, INMETCO is not in the 100-year flood plane.

Regional structure consists of a homocline, which dips, in a southerly direction. However, numerous small undulations and other minor structural features are superimposed on the regional trend. Bedrock underlying the INMETCO plant dips approximately one percent to the west-southwest. There are no major faults identified in this area. However, lineaments, fractures, and joints are generally quite prevalent.

Stratigraphic units present in the study area primarily belong to the Pottsville Group of the Pennsylvania System. Overlying Allegheny Group strata (Clarion Formation) comprise adjacent hilltops. The lowest exposed stratigraphic unit is the Upper Connoquenessing Sandstone Member, which is quite massive and laterally extensive. Above this are argillaceous strata, which comprise the Mercer Shale Member. Situated above the Mercer Shale Member is the 30-foot to 50-foot thick Homewood Sandstone. This unit typically forms topographic flats in upland areas and cliffs along its outcrop. The Homewood Sandstone is light brown to gray in color and is often quite iron stained; it is generally fine grained near the top of the unit and becomes medium grained with depth. Clay streaks are common and it also exhibits extensive cross bedding. Strata of the Clarion Formation (Allegheny Group) above the Homewood Sandstone comprise hilltops situated adjacent to the INMETCO facility. Lithologies include interbedded shale and sandstone and several thin coal seams.

18. Community Relations

INMETCO has good community relations with the local citizens. Approximately 75% of Inmetco's work force live within a 15 mile radius of the facility.

19. Environmental Litigation



Version 03/25/2015

INMETCO has no pending or past environmental litigation involving the facility, its employees or its officers. INMETCO has no compliance issues with any federal, state or local agency.

20. PCB's & Asbestos

INMETCO has no PCB-containing materials on site.

INMETCO has conducted Asbestos Abatement of Asbestos found on site from the former US Steel operation. All known asbestos has been removed and properly disposed of.

21. Boiler and Industrial Furnace Rule (BIF)

INMETCO's furnace operation is exempted from the BIF regulations as stated in 40 CFR § 260, 261, 265 & 266. See section 266.100 (c) and Appendix XII, as published in Federal Register/Volume 56, No. 166/Tuesday, August 27, 1991/ Rules and Regulations. INMETCO filed its notice under the rule with EPA/DEP on August 16, 1991. A supplemental notice pursuant to the rule on August 21, 1991 was filed, as per the regulation.

22. INMETCO's Co-Product Slag (Aggregate)

The INMETCO Process produces annually approximately 14,000 to 19,000 tons of a rock aggregate slag. Inmetco's slag is covered by 40 CFR 266.20 Subpart C; Recyclable Materials used in a manner constituting disposal.

The slag is sold locally for use as construction aggregate for roads, parking lots and backfill.

23. Inmetco Products

Nickel-Chromium-Iron-Moly Remelt Alloy is sold to the stainless steel mills for the manufacturing of stainless steel products.

24. Miscellaneous Notes:

The DEP, Bureau of Solid Waste, conducts RCRA inspections approximately four times per year. The local solid waste inspector at (724) 656-3160.

INMETCO's: EPA I.D. number is PAD087561015
 Dunn and Bradstreet number is 08-756-1015
 Federal Tax number is 13-2858892
 Incorporated in the state of Delaware
 NAICS 331492

24. Miscellaneous Notes cont.



Version 03/25/2015

INMETCO is a wholly owned subsidiary of:
 Horsehead Holding Corporation
 4955 Steubenville Pike, Suite 405
 Pittsburgh, PA 15205
 724-773-2212
 Dun & Bradstreet (DB) #609074703

List of Surrounding Land Uses
 North Residential
 South Industrial/Woodlot
 East Residential
 West Industrial

Population within 1 mile of the facility: 11,000
 4 miles of the facility: 17,000
 Ellwood Boro: 8,890

Latitude is 40:51:25, Longitude is 80:16:37

Inmetco is less than a half-mile away from the nearest school, hospital and fire department.

Total number of employees: 104
 74 Union Hourly
 61 are in Production
 13 are in Maintenance
 30 Salaried
 2 are in the Environment, Health & Safety Department personnel*
 *Both individuals have been employee at in Inmetco in excess of 20 years

Facility-wide turnover rate over the past 3 years was less than 6%

Average annual precipitation (rainfall) in Ellwood City, PA is: 36 - 39"
 Rain events - 10 year: 3.9", 25 year: 4.2", 100 year: 5.2"
 Prevailing wind direction - from West & South - Speed: 5-15 knots
 Mean annual lake evaporation is 20 - 30" per year
 Altitude above sea level 917.7'
 Average Barometric Pressure 1017.5 Millibars
 Average Relative humidity 58%
 Seismic Coefficient Factor #1
 Average Temperatures: Minimum 20°F, Mean 59°F, Maximum 61.9°F
 Average Soil Pressure Bearing Load 2,000 PSF
 Total Under Roof Facility Square Footage 350,244



N. Shipping batteries instructions

Recharging the planet. Recycling your batteries.



How to Safely Pack and Ship Batteries using the Call2Recycle Program





Recharging the planet. Recycling your batteries.™



How to Safely Pack and Ship Batteries using the Call2Recycle Program

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

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

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

Call2Recycle General Terms / Definitions

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

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



Batteries Accepted in the Call2Recycle Program

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

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

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

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



Call2Recycle Program Options

Call2Recycle Box Program

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

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



Call2Recycle Bulk Program

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



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

Preparing Batteries for Shipment

Protect Batteries and Terminals

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

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



Preparing Batteries for Shipment

Using Call2Recycle Boxes

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

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

Call2Recycle Boxes Include Bags to Ensure Terminal Protection for all Batteries

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

Using the Bulk Shipping Option

Mixed Battery Chemistries in the Same Container

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

Single Battery Chemistries in a Container

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

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



Shipping Your Batteries

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

Call2Recycle Boxes

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

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

Prepare Box for Shipping

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

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



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



Bulk Shipments

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

Special Instructions: Lithium based batteries

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

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



After the Shipment

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

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

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

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

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



Box Anomaly Report - SAMPLE ONLY

Vermont Collector

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

Total Receipts: 1,248

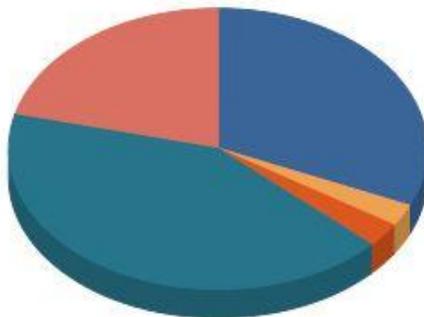
Total Exceptions: 38

3.04% of Total Receipts

Sites with Exceptions: 36

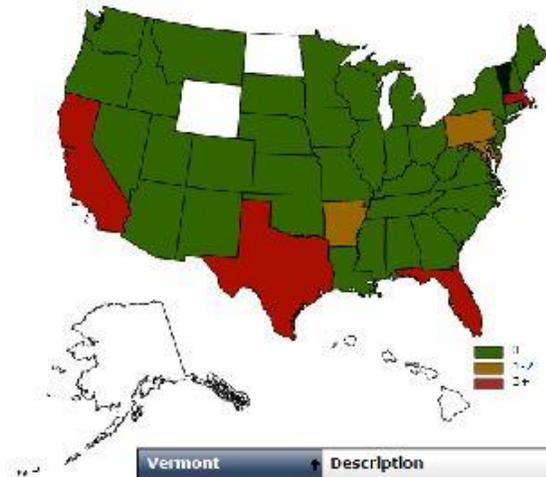
Total Sites: 140

Exceptions Breakdown



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

Interactive Map



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



O. Sample non-compliance report

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



P. BOL Wizard instructions (excerpt)

Recharging the planet. Recycling your batteries.™



SHIPPING YOUR BATTERIES IS SAFE, EASY AND FREE!

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

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

Before You Begin:

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

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

PLEASE READ BEFORE YOU PROCEED.

Call2Recycle offers a Bill of Lading (BOL) Wizard to help you create a BOL in a few easy steps. **You must have a minimum of 500 lbs. of batteries in total weight to ship in bulk.** Pallet weight not to exceed 2,500 lbs.

Questions? If you are in the US, contact our Customer Service Team at 877.723.1297. For bulk shipping in Canada, [click here](#). Not a participating collection site? [Request information](#) about the program.

YOU WILL NEED THE FOLLOWING INFORMATION TO COMPLETE THE BOL:

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

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

Next >>



Recharging the planet. Recycling your batteries.™



SHIPPING YOUR BATTERIES IS SAFE, EASY AND FREE!

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

STEP 5: SCHEDULE A PICKUP (OPTIONAL)

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



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

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

Provide your Pickup Contact Information

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

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

Provide your Pickup Contact Information

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

<< Previous

Next >>



Recharging the planet. Recycling your batteries.™



SHIPPING YOUR BATTERIES IS SAFE, EASY AND FREE!

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

CONGRATULATIONS! YOUR PDFS ARE READY TO PRINT

Please remove all old labels from containers, unless they are still applicable to the contents being shipped. Please affix a copy of the shipping label to each container and update the label accordingly.

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

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

Download & Print BOL 

Download Shipping Label 

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

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

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

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

Thank you!

[<< Previous](#)

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



Q. Sample marketing materials

Recycle your batteries here

Make a positive impact in your community.

Look for the collection box inside. ▶

call2recycle®

Window
Rack card

Recycle your batteries here

Single-use and rechargeable batteries



Make a positive impact in your community.

www.call2recycle.org

call2recycle®

Cling



Municipal Flyer



Battery Recycling Program

Good for you. Good for the environment.

Chittenden County recycles batteries*

Recycle your batteries at a location listed below:

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

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

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

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

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

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

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

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

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

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

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

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

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

*Batteries weighing 11 lbs. or less

call2recycle.org

© 2015 Call2Recycle® All rights reserved.



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

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



S. Excerpt from the EU battery directive

2006L0066 — EN — 05.12.2008 — 002.001 — 11

▼B

Article 9

Economic instruments

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

Article 10

Collection targets

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

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

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

(a) 25 % by 26 September 2012;

(b) 45 % by 26 September 2016.

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

▼M1

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

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

▼B

Article 11

Removal of waste batteries and accumulators

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

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