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Community Protection and Hazardous Waste Reduction Initiative Pilot Project Proposal Form

Instructions

This form contains fillable fields. Mouseover each field for additional instructions. Not all fields need to be completed for submission, and general responses are acceptable if more specific responses have not been developed.

1.0 Pilot Project Summary

Identify the primary components of this pilot project.

Waste Stream: Lead Acid Battery Manufacture, Use, Collection and Recycling

Industry: Various, predominantly vehicles.

Geography: Everywhere

Stakeholders: Consumers, communities, battery users, manufacturers, recyclers, remediation

Government: DTSC, Local Government,

2.0 Pilot Project Details

Describe this pilot project and how it fits with the overall goals and objectives of the CPHWR Initiative. Characterize the waste(s) to be reduced and the implications.

How can lead exposure be reduced to the lowest economically feasible level due to the use and management of recycled lead acid batteries?

Rather than focus on the development of new or different battery technologies, the emphasis on this pilot project would be to better document the exposure to lead from an evaluation and assessment over all aspects of lead acid battery manufacture, use and management. A better understanding is needed of the points of lead exposure and the most feasible methods to limit such exposure. A collaborative effort should be conducted between DTSC and the battery industry to better understand where releases are most likely and which can be controlled. Rather than create a new Product Stewardship organization, the DTSC and industry should build upon the existing battery collection framework which USEPA describes as a model example of a successful stewardship program. Development of alternative battery technology should be evaluated only as a last resort. While the unfortunate situation with the Exide Battery facility in Vernon should be an important factor, it should not be to the exclusion of all other sources of information about the safe and effective management of lead batteries.

Particular emphasis should also be placed on evaluating technologies to minimize waste slag produced in the lead battery carcass recycling process.

As a supplementary assessment, the cost effective evaluation of alternative remediation strategies should also be considered. The comparative cost-effectiveness to control current and future exposure of onsite treatment and disposal should be compared with offsite removal, treatment and secure disposal.



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3.0 Pilot Project Characteristics

Identify any applicable characteristics of this pilot project.

Source reduction or elimination
 Provides a permanent solution

Minimizes or avoids disposal
 Avoids media shifting

Long term reductions
 Replicable

Short term reductions
 Scalable

Decreases high volume waste
 Decreases toxicity of waste

Decreases high toxicity waste
 Reduces waste treatment impacts

Economically beneficial
 Stakeholders willing to participate

Represents a viable alternative
 Benefits EJ community

Other: Maximize recycling and limit exposure to lead

Describe how this pilot project addresses the characteristics identified above.

By ensuring that exposure to lead is minimized in a thorough and transparent manner should provide a permanent solution and should meet the needs to the EJ Community, provided they have confidence in the project. Long term reductions in adverse exposures to lead contamination should be achieved. By improving and building upon the current battery recycling framework, the cost of the program should be minimized. Industry stakeholders should be willing to participate. However, EJ stakeholders may be reluctant unless they are convinced that adequate protection from lead exposure will be accomplished. The program will continue to maximize the recycling of lead acid batteries by ensuring minimum exposure to lead and lead compounds. Disposal of lead acid batter waste will be minimized to the maximum feasible degree. Waste slag from the processing of lead battery carcasses will be minimized by exploring and encouraging alternative slag management strategies. This strategy will avoid media shifting by ensuring that lead acid battery materials are kept within a closed loop system with minimum opportunity for exposure outside of that system. The project should be scalable to encompass the entire lead acid battery industry. Waste will be minimized by viewing batteries as a continuously recycled and recovered resource rather than as a waste.



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4.0 **Pilot Project Considerations**

Identify resources, tools and/or experts which can be used to gather information in support of this pilot project.

A complete evaluation and assessment of the entire California battery industry will have to be conducted by DTSC including the use of out-of-state facilities. Individual lead-acid battery collection, storage and processing steps will have to be evaluated to make sure minimum exposure and release can be accomplished.

Identify other agencies that may have jurisdiction where this pilot project will be implemented.

USEPA, Local Governments, OEHHA, SWRCB, RWQCB, ARB, CUPAs and Air Districts.

Identify areas of potential competing considerations and objectives (including technical, legal, environmental, social, and economic factors).

A major consideration would be the acceptance by the EJ Communities who are distrustful of the lead acid battery industry. Considerable work will be required to build and regain this trust.

Discuss other possible benefits in addition to decreasing the volume and toxicity of hazardous waste.

Lead and the other hazardous and non-hazardous component parts of the lead acid battery industry will be strictly internalized or controlled.

What are other key items to consider in completing this pilot project?

Will this approach be sufficient to satisfy those individuals concerned that they are not being adequately protected from the continued use and management of lead acid batteries? Will the comprehensive evaluation of the management of lead acid batteries be sufficient to fully identify all significant pathways for lead release and exposure?

Identify the various approaches to implementing this pilot project.

Conduct an evaluation and assessment of battery management practices in all of CA.

Conduct an evaluation and assessment of of battery management practices for only a pilot portion of the state -- say Los Angeles County.