



Scott Fulford
Ecobat, LLC
(972) 996-0861
Scott.Fulford@Ecobat.com

September 17, 2023

VIA E-MAIL

Hazardous Waste Management Report Staff
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826
DTSC_HWPlan@dtsc.ca.gov

Re: Comments on Draft Hazardous Waste Management Report

Dear Hazardous Waste Management Report Staff:

Thank you for the opportunity to provide comments to the Department regarding its recently released Draft Hazardous Waste Management Report. Ecobat greatly appreciated the insight provided in the Report, and it was clear that significant effort went into the underlying analysis. We greatly appreciate these efforts, and are confident that the Report will provide a solid foundation for the future development of a Hazardous Waste Management Plan, and related policy discussions regarding California's management of hazardous waste, discussions that Ecobat looks forward to participating in.

Ecobat is the world's largest battery recycler that meets essential energy storage needs by making the business of batteries safer and more sustainable for a circular energy economy. In 2021, Ecobat's lead battery recycling business fully recycled 70 million car batteries worldwide. We have a vast network that powers industries across the globe, including our Ecobat California facility located in the City of Industry. This important facility is the only major lead-acid battery recycling operation west of the Rocky Mountains, and is responsible for the safe and responsible recycling of the vast majority of spent lead acid batteries generated in California.

Lead acid batteries are an essential component of the transportation infrastructure in the U.S. Not only are these batteries essential to the operation of gasoline and diesel transportation, but are also necessary component of electric vehicles as well, meaning responsible management of spent lead acid batteries will remain important well beyond California's transition to electric vehicles in the coming years.

The Draft Hazardous Waste Management Report details a number of priorities that are entirely consistent with (and advanced by) Ecobat's California operations. Specifically:

Capacity Assurance: The Report discusses the importance of ensuring that adequate capacity exists to ensure that hazardous waste generated in California is managed in California. The continued operation of the Ecobat California facility is essential to maintaining and maximizing

the recycling and reuse of used lead-acid batteries in California. Failure to effectively provide for the continued operation of used battery recycling and reuse in California could have serious public safety, human health and environmental consequences.

Circular Economy: Similarly, the report discusses the importance of managing hazardous waste to support the circular economy through the recycling of products, minimizing the need for additional raw materials and for waste disposal. According to the U.S. EPA, car batteries are the most recycled products in the U.S., having a 98 percent to 99 percent recycling rate. A recent Battery Council International report found that 99 percent of US lead acid batteries are recycled (<https://batteryCouncil.org/new-study-confirms-lead-batteries-maintain-remarkable-99-recycling-rate/>). And as the only lead acid battery recycler in California, we are proud of the key role we play in ensuring the handling of lead acid batteries in California supports the circular economy.

Waste Management Hierarchy: Finally, as a recycler, Ecobat's operations help further DTSC's waste management hierarchy by ensuring that spent lead acid batteries are safely recycled and not disposed of.

Ecobat is hopeful that the Hazardous Waste Management Plan will recognize the benefits of, and place a high priority on, the continued operation of facilities such as Ecobat that work to maximize the recycling and reuse of hazardous waste in California.

Very Truly Yours,

A handwritten signature in black ink, appearing to read 'S. J. Fulford', with a long horizontal line extending to the right.

Scott J. Fulford
Associate General Counsel