

From: [Coster, Billy](#)
To: [Margolis, Anne](#)
Subject: ANR - Act 31 Energy Storage Regulation Draft Recommendations
Date: Friday, November 08, 2019 3:55:49 PM

Anne,

Please see ANR's suggested edits/additions to your draft storage report. These were complied by the DEC Solid Waste and Hazardous Waste Programs. If you have questions of would like to discuss any of this, please let me know.

From Page 7:

- The Agency of Natural Resources (“ANR”) has recommended that all batteries be banned from disposal (including landfill disposal and incineration) due to concerns about potential corrosivity, reactivity, fire hazard, and the safety of waste management personnel.¹⁷ **Further, as society increases reliance on battery power, recycling the elements from batteries has both social and environmental benefits in terms of conserving resources.**
- Add the words “...when discarded” to the last sentence of the first paragraph in the “Impacts to environmental health” section on page 7 (i.e., *Batteries from sources other than households may also be subject to regulation under the Vermont Hazardous Waste Management Regulations as either hazardous waste or universal waste when discarded.*)
- Indicate that owner/operators of larger/stationary energy storage facilities that require maintenance, are required to determine if waste resulting from maintenance are subject to regulation as hazardous waste. If waste(s) are determined to be hazardous waste, the owner/operator must then comply with the VHWMR (e.g., notify the Agency of hazardous waste activity using the Hazardous Waste Handler Site Identification Form, manage hazardous waste in accordance with applicable VHWMR requirements).

From page 16 last bullet:

Amend Rule 5.904 to include an equivalent section for storage facilities. At a minimum, for storage installations of all sizes, the Department recommends a provision for the proper disposal/**recycling** of the device(s) consistent with environmental regulatory parameters. For larger installations, the decommissioning requirements of Rule 5.904 should apply to stand-alone or integrated storage.

Thanks!
Billy

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