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To: Maryland Senate Education, Energy, and the Environment Committee  
Re: SB0532 Commission to Advance Lithium–Ion Battery Safety in Maryland

The Solid Waste Association of North America (SWANA) appreciates the opportunity to support Senate Bill 0532. SWANA is an organization of 10,000 public and private sector professionals committed to advancing from solid waste management to resource management through a shared emphasis on education, advocacy, and research. Our members include the individuals collecting and transferring materials for recycling and disposal, running recycling facilities, managing landfills, providing residential recycling services and outreach, and overseeing solid waste departments, among many other job functions throughout the industry. For more than 50 years, SWANA has been the leading association in the solid waste management field.

This bill calls for a Commission to study and make recommendations regarding: best practices on preventing, detecting, and suppressing fires caused by lithium–ion batteries, reusing and recycling lithium–ion batteries; the viability of extended producer responsibility for lithium–ion batteries; education for the public on lithium–ion battery safety; and any other global issues the Commission may consider useful for enhancing the safety and reuse of batteries in Maryland. Lithium–ion batteries are embedded in common household electronic devices such as cell phones, laptops, tablets, wireless headphones, electronic toys, hearing aids, vaping devices, appliances, power tools, and more. They are also used in electric vehicles, e-bikes, and electric scooters. The use of lithium–ion batteries is continuously growing.

It is vital that proper systems are in place to properly manage the end of life of these batteries. Due to the potential of lithium-ion batteries to catch fire or explode if not handled properly, the EPA considers most lithium-ion batteries to be hazardous wastes when disposed (<https://www.epa.gov/hw/lithium-ion-battery-recycling#waste>).

The proper management of lithium-ion batteries is of increasing concern in the waste and recycling industry. They are posing significant fire hazards at collection sites, within collection vehicles, at transfer stations, and at recycling processing facilities. SWANA's first strategic goal is to make the industry safer, and our [strategic plan](#) specifically includes the need to address lithium-ion batteries, as they are a growing safety risk for workers in the industry.

When residents mistakenly dispose of electronics or loose batteries in their regular household trash or recycling, it creates a safety risk for the individuals managing that material. When the batteries are dropped or scraped on hard surfaces, or crushed by heavy equipment, they can



quickly create fires as they are surrounded by flammable waste and recycling materials. Collection vehicles are at risk when the compaction equipment breaks a battery, causing a fire or explosion. This is a danger not only for the crew in and around the truck, but also any drivers or pedestrians in the vicinity.

In addition to worker safety, the facilities are at risk of suffering serious damage that may put them out of operation. Fires have caused numerous material recovery facilities (MRFs) and other recycling and waste processing sites to go out of commission for months at a time, impacting the regions they serve. Insurance rates at MRFs have been increasing due to the risk of fires, an additional cost for MRFs that are vital for the state's recycling goals.

It is also important to identify options to increase recycling rates of lithium-ion batteries which contain valuable materials that should be recovered decreasing the need to source raw materials. SWANA's members work to promote recycling and manage recycling centers and contracts.

SWANA worked with the Institute of Scrap Recycling Industries (ISRI) and the National Waste and Recycling Association (NWRA) in 2022 to issue [a joint letter](#) to EPA Administrator Regan on the best practices for safe recycling and labeling of lithium batteries. The letter was in response to the EPA's [Request for Information](#) on the Development of Best Practices for Collection of Batteries to be Recycled and Voluntary Battery Labeling Guidelines. SWANA continues to work on operational and advocacy solutions for avoiding fires caused by lithium-ion batteries, including [a guide](#) for lithium battery management at material recovery facilities.

The proposed commission will provide the opportunity to investigate and recommend solutions appropriate for Maryland.

SWANA supports passage of Senate Bill 0532. If you have any questions about these comments, or about SWANA, please contact Kristyn Oldendorf, SWANA's Director of Public Policy, at [koldendorf@swana.org](mailto:koldendorf@swana.org) or 240-494-2237.

Thank you for the opportunity to support this bill and for your consideration.

Sincerely,

Kristyn Oldendorf  
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Solid Waste Association of North America (SWANA)