

▼ Land Protection Division Updates



OKLAHOMA
Environmental
Quality

Staff Changes

Anne Marie Smith

Solid Waste Permitting



Jim Wilkins

Hazardous Waste Permitting



Staff Changes



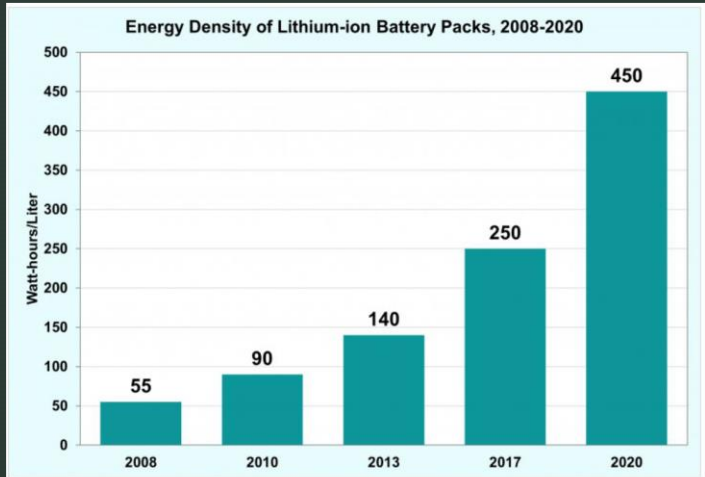
Keisha Cornelius

Radiation Management

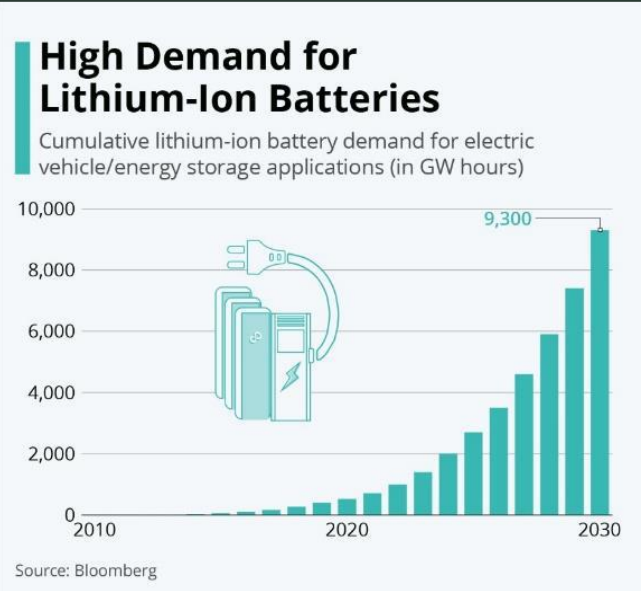
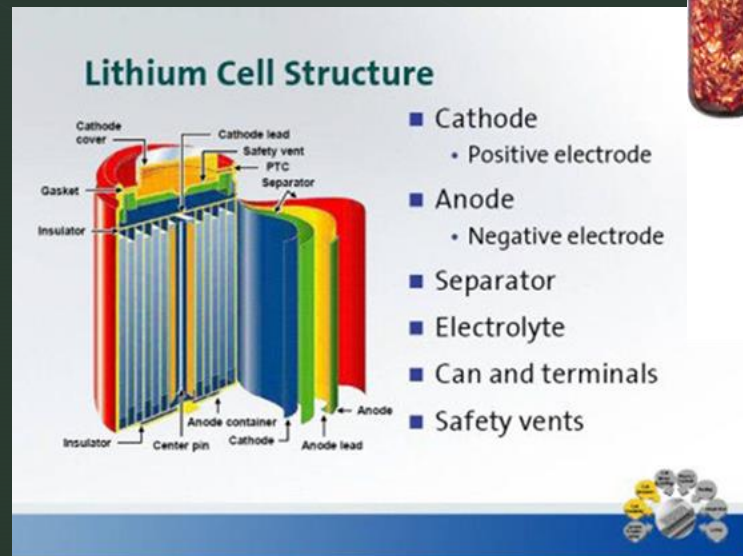
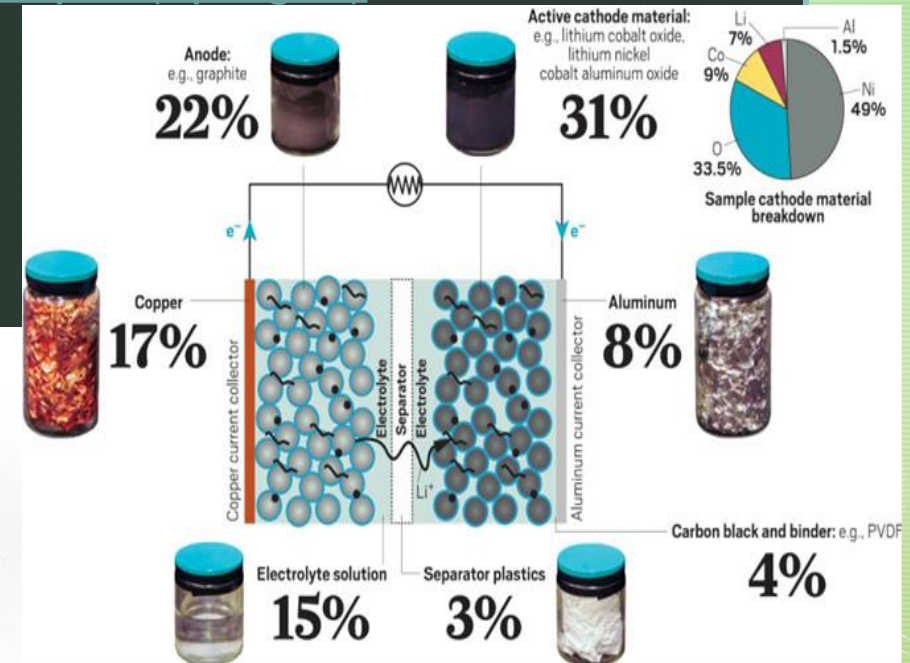
Hazardous Waste Updates

Lithium Battery Recycling

[14957.pdf \(epa.gov\)](https://www.epa.gov/14957.pdf)



Source: Nitin Muralidharan, Ethan C. Self, Marm Dixit, Zhijia Du, Rachid Essehli, Ruhul Amin, Jagjit Nanda, Ilias Belharouak, Advanced Energy Materials, *Next-Generation Cobalt-Free Cathodes - A Prospective Solution to the Battery Industry's Cobalt Problem*, January 2022.



Hazardous Waste Lithium-Ion Batteries

Generators

- Household -exempt
- Certain actions prior to recycling are exempt from permitting
- Process dependent
- Rechargeable and single use can be managed as universal waste

Destination Facilities

- Storage Prior to processing is key to whether permit is required
- Recycler that stores hazardous waste or universal waste before recycling (batteries, black mass, etc) requires RCRA permit
- Any storage more than incidental may trigger need for permit

Lithium-Ion Batteries Best Management Practices

Safety training

Isolating terminals with non-conductive tape or similar

Preventing damage

Storing in climate-controlled spaces with good ventilation

Storing in separate building away from flammables and people

Storing damaged, defective, recalled separately in appropriate containers

Advanced fire detection/suppression equipment

Frequent visual and thermal inspections



Solid Waste Updates

Composting Rules

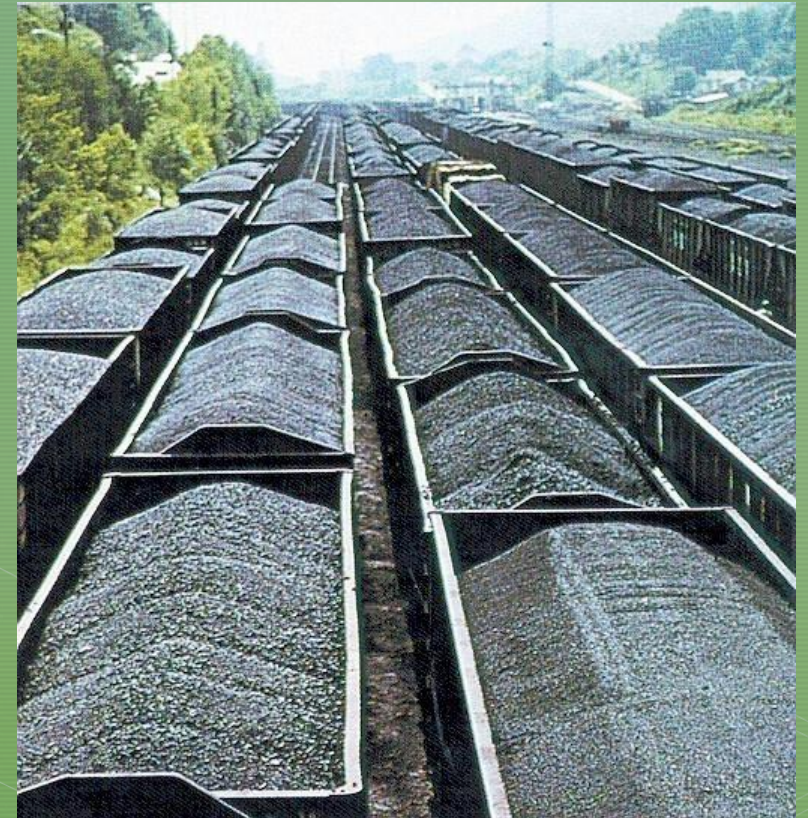


Used Tire Market Development Grant



Coal Combustion Residuals Proposed Rule to Regulate Legacy CCR units

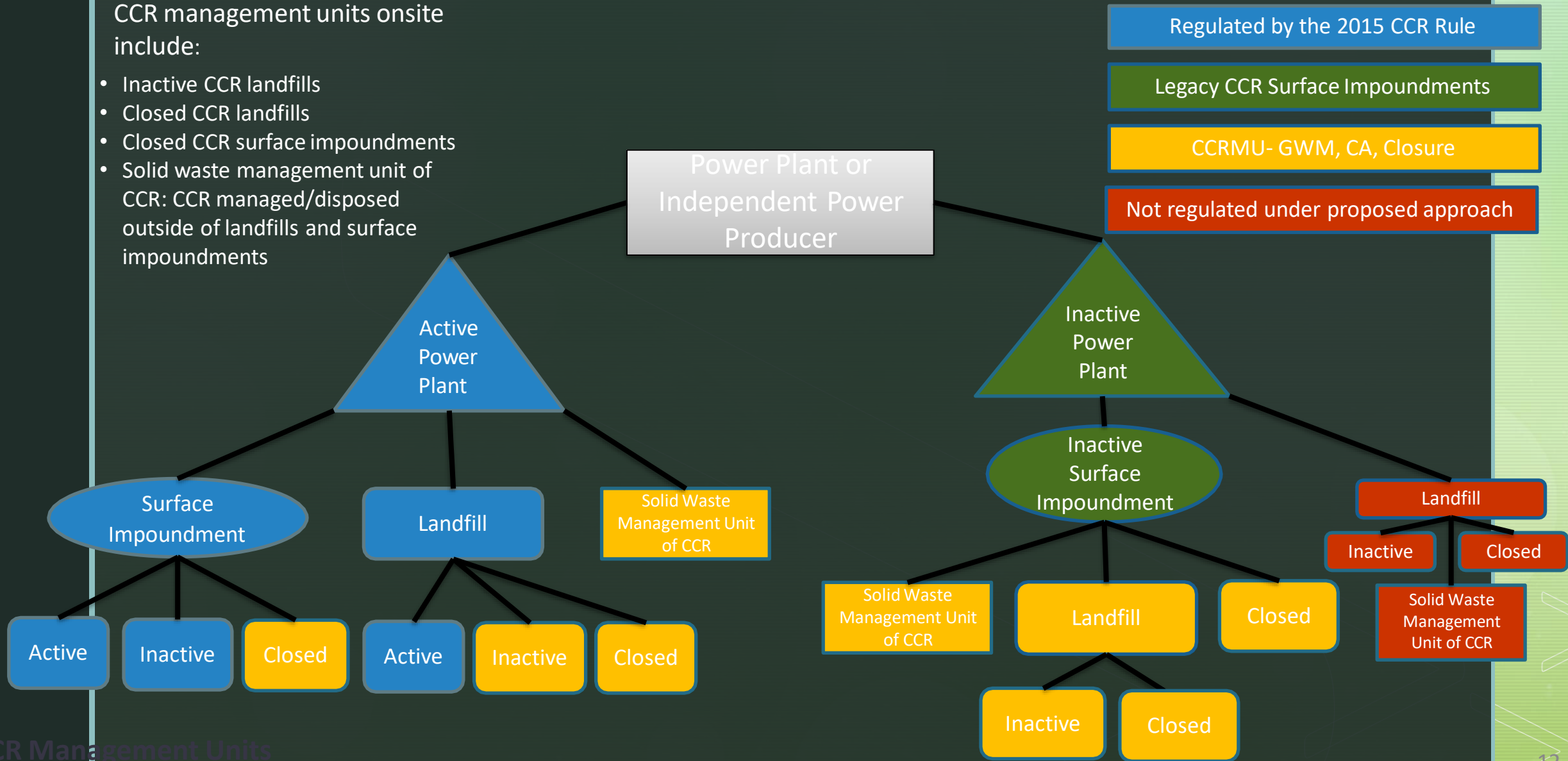
- Proposing to regulate inactive surface impoundments, and CCR management units (new) similar to parts of the 2015 CCR Rule
- Comment period closes July 17, 2023
- Facilities would have to inventory & delineate CCRMU and document findings on website
- DEQ would have to revise rules and seek EPA program approval to regulate any legacy unit under a state program



CCR Management Units at Power Plants

CCR management units onsite include:

- Inactive CCR landfills
- Closed CCR landfills
- Closed CCR surface impoundments
- Solid waste management unit of CCR: CCR managed/disposed outside of landfills and surface impoundments



- Regulated by the 2015 CCR Rule
- Legacy CCR Surface Impoundments
- CCRMU- GWM, CA, Closure
- Not regulated under proposed approach

PFAS as CERCLA Hazardous Substance



PFOA and PFOS are proposed

Final rule scheduled for August 2023

ANPRM for 7 others under CERCLA

- PFBS, PFHxS, PFNA, HFPO-DA (GenX), PFBA, PFHxA and PFDA
- Comment period extended to Aug 11, 2023
- All seven are included in UCMR5

CERCLA Approach

Benefits

- Releases above RQ reported
- More data on prevalence
- Assessment and Cleanup by Responsible Party



Concerns

- Disposal/treatment technologies
- Lab capacity
- Potential Severe Impact to Passive Receivers
 - PTWs, Landfills, Ag lands
- EPA's solution is enforcement discretion and settlement agreements
 - Enforcement discretion will not stop 3rd party lawsuits
 - Settlement agreements take time and are not easy
- Possible impact to Brownfields redevelopment
- Potential Disruption to Sanitary Services
- Economic Impacts

Event Recycling





Pounds Diverted

2021-2023

7,520 Recyclables

Compost 3,000

ONE Truckload Food Donation

144 Volunteers

Volunteer Hours 1390