

Speaker 1: ... you can, just please put your name and your associated agency in the chat, we can then proceed from there. All right, I guess, at this time, I'd like to pass the meeting off to the commissioner just for introductions.

Speaker 2: All right. Great. So thank you for everybody that came here today. Thank you for everybody joining us online. I'd like to start by welcoming everybody to New York City Local Emergency Planning Committee. Thank you all for joining us [00:00:30] today. I think as all of you, or most of you aware, this is the first in-person, I guess it's not... Can we call us an in-person meeting? Hybrid?

Group: Hybrid.

Speaker 2: Hybrid, since 2019, we're getting there. Hopefully, the next one in a year will be fully in-person. Although, I don't know, I guess hybrid is also the new normal. As commissioner, New York City Emergency Management. I just want to emphasize how important it's for us to all be connected to the communities that we serve, and meetings like this are very [00:01:00] critical to enable us to be able to do that and achieve that mission.

And these partnerships are also really important to us be better prepared, excuse me, that's a tricky one, for any emergency, including those with hazardous materials incidents. Today, we'll be hearing from a number of different experts. Look forward to those conversations. It's critically important information that will be disseminated, and it's also really important that you all help us disseminate [00:01:30] that information to your constituents, your communities, your agencies. And just want to close by in particular thinking the LEPC team, particularly my team here at NYCCEM for their hard work in putting these meetings together. Hope you find it informative and helpful, and thank you all for participating. I'm looking forward to getting to know everybody today, and in coming meetings and in our work together. Thank you.

Speaker 3: Thank you very much.

Group: Thank you.

Speaker: Thank you.

Speaker: I guess it would be [inaudible 00:02:00] to pass it along to [00:02:00] Commissioner Cosgrove. Can you hear us?

Speaker 3: You know what? I think I'm going to call him straight.

Speaker 1: Call him straight, okay.

[00:02:30] There's one thing I've learned at emergency management's adaptability.

Speaker 3: Commissioner?

Speaker 4: Commissioner Cosgrove speaking.

Speaker 3: Yes, Commissioner, you're on the phone here at OEM.

Speaker 4: Good morning everybody. And [00:03:00] thank you for your persistence in trying to make this hybrid meeting work. And thank you, Commissioner Iscol, for your remarks. In light of our slow start this morning, I'd like to thank everybody for participating in their local emergency planning committee, and remind everybody that this is a collaboration that's mandated by federal law of the Emergency Planning and Community Right to Know Act.

[00:03:30] We are a combination of elected state and local officials, police, fire, civil defense, public health professionals from the environment, transportation, hospital officials, facility representatives and representatives from community groups and immediate. We've developed emergency response plans, and in there we identify facilities and transportation routes of extremely hazardous substances.

We describe the emergency response procedures on offsite, and designation of a community coordinator [00:04:00] and facility emergency management coordinators to implement our plans. We outline our emergency notification procedures and descriptions of how to determine the proper players affected by public releases. Description of local emergency equipment and facilities, the person's responsible for them, outlining evacuation plans, training methods and methods [inaudible 00:04:21] of emergency exercise response plans.

The New York City's Community Right To Know program, a Local Law 26 of 1988, requires a [00:04:30] city to effectively regulate the storage, use, and handling of hazardous substances. As part of the law, we oversee the use of storage of hazardous substances that pose a threat to the public health and environment of New York City to through it's Right to Know program.

The Right to Know program manages to reporting and storage of hazardous substances by requiring businesses and facilities to annually file a tier two report detailing the quantity, location, and chemical nature of very hazardous substance stored within their facilities or throughout the five boroughs.

[00:05:00] The Community Right to Know program uses an online reporting system that allows facilities to entirely submit their annual revise or updated tier two submissions. And the deadline for filing is March 1st, every year. The law also requires a risk management plan that is filed. Facilities that store or use extremely hazardous substances or regulated toxic substances that are at or above the threshold planning quantity, or TPQ, as listed in the law, are required to prepare [00:05:30] and submit a risk management plan, or RMP, to the

Department of Environmental Protection for review comment and approval after an inspection of the facilities conducted.

This morning, I'm happy to have representing the DEP at today's meeting is Director Harry Meyer, Director of the Division of Emergency Response and Technical Analysis and Deputy Director Joanne Nurse from the Division of Emergency Response and Technical Analysis. [00:06:00] Thank you, Speaker 1 for the introduction and the patience of everybody there. And at this time I'd like to turn it back to you for the minutes of the last meeting.

Speaker 1:

Thank you very much Commissioner. If you'd like a full copy of last year's transcript, that's being found on your city emergency management's website. The minutes from the 2021 LEPC meeting. The meeting opened up by providing general housekeeping [00:06:30] rules based on the total online format. After the housekeeping rules, introductions were made for those participating in that year's LEPC. After introductions, there were the reading of the 2020 LEPC minutes. After the reading of those minutes, we proceeded on to part of a quarterly HSAB, or the Hazardous Substance Advisory Board meeting.

[00:07:00] After the 2020 HSAB meeting, we were able to review the 2021 HSAB metrics, which were as follows. As of May 31st, 2021, [00:07:30] the Right to Know program received 11,175 tier two submissions, out of the 11,175 submissions, 335 new facilities were added to the database, and submitted 2020 tier two reports. There were a total of 10,787 facilities that submitted online, and 388 submitted a hard copy report. That was a 96.5% [00:08:00] submission online, only three point five percent of the facilities submitted a hard copy report.

As for risk management plans, the Right to Know program currently had 3000, I'm sorry, 370 plans on file, and an additional 44 that were required to submit RMP reports. The Right to Know program received 64 updated risk management plans, and 114 [00:08:30] affidavit letters indicating that there were no change to their existing plan. There were 51 risk management plan reports under review and 11 facilities that had been inspected.

Regarding the inspections, the Right to Know program inspection unit had a total of 9,718 inspected during the 2021 fiscal year. Out of the 469 facilities [00:09:00] that were exempt from filing, 694 facilities went out of business, 1,775 facilities were closed and there was no access, and 65 facilities were issued a notice of violation for non-compliance with the laws and regulations.

After the HSAB metrics was reported out, [00:09:30] two items of noteworthiness were mentioned. One was dealing with the abandonment or orphaned materials, and basically who the responsible party would be as a result of a farm accident. The other noteworthy item that was mentioned during this meeting was related to the joint agency effort regarding the Andrew T [00:10:00] Cleckley Funeral Home response.

PART 1 OF 4 ENDS [00:10:04]

- Speaker 1: We [inaudible 00:10:00] a response. After that, the upcoming details for that year were assessed by everybody. That concludes the overview of the 2021 LETC minutes. Again, the full transcript can be found on New York City's Emergency Management web page. Thank you very [00:10:30] much. Eric?
- Speaker 5: Thank you. So as is customary when we have the LETC, we usually merge in the Hazardous Substance Advisory Board meeting, but that won't start at this point. We'll begin by reviewing the most recent minutes from the March 15, 2022, meeting. I'll give that to Joanne to review.
- Speaker 6: The Habit of Substance Advisory Board meeting began at approximately 10: [00:11:00] 35 on March 15, 2022. In attendance was our Commissioner Cosgrove, our Assistant Commissioner Peter Fusbo, Deputy Director Harry Meyer, Deputy Director John Norris, [inaudible 00:11:15] Noreen Galler off in PP, [inaudible 00:11:20] Captain Vincent Samino from Fire Department and Christopher Liand from Department of Health, along with every part in the podium. The first agenda for the meeting back [00:11:30] to Director Meyer opened the [inaudible 00:11:32] by welcoming the participants to the first [inaudible 00:11:35] of the year. He introduced all the participants representing the UK as stated their roles. Deputy Director Meyer introduced Mr. Christopher Williams from the [inaudible 00:11:50] in the role of Director of Emergency Kind and Environmental Health and Safety [00:12:00] for the agency.
- Mr. Lerens has [inaudible 00:12:02] is happy to be in his new role and will be happy to contribute in any way he can. The Deputy Director Mayer then asked if you have any questions or concerns, please announce it in the minutes which was held on December 14, 2021. And as they were done, the minutes were accepted as reason. Deputy Director Harris provided an updates on the 2021 [inaudible 00:12:28] submission here, and stated [00:12:30] that no in person workshops were held due to Covid. She also stated although there were no workshops, the staff continued to assist facilities like before, and [inaudible 00:12:41] which has proven to be successful. She also stated that in January, 2022, additional training and accounts received and reconciliation was conducted for the [inaudible 00:12:58] staff, together understand how the process shapes for multiple and work facilities. [00:13:00] Deputy Director Norris expressed her appreciation to Captain Sirena for his assistant on obtaining an email address for the Fire Department. So that facility is no longer [inaudible 00:13:12] hard copy of [inaudible 00:13:13] submissions by regular mail.
- She also explained that the risk management part of the group is so [inaudible 00:13:22] one more employee that chose another career path. Inspections are still not being conducted in hospitals [inaudible 00:13:30] [00:13:30] due to Covid protocols. Mr. Sackley [inaudible 00:13:34] gave an update on the matrix for the 32 submissions received thus far in the [inaudible 00:13:40]. She stated

that to date, the right to know program has received 10,656 submissions. She also stated that of these submissions, 10,445 were submitted online and 211 facilities submitted a hard copy report. [00:14:00] Mr. [inaudible 00:14:02] stated that 240 submissions were received from new facilities. The program from me has 318 risk management plans on file, and an additional six facilities are required to submit an RNP. Mr. Jackson stated that the right to know program [inaudible 00:14:21] has received 103 [inaudible 00:14:24] measures indicating that there were no changes, and four of these [inaudible 00:14:29]. He also [00:14:30] reported that there are currently 26 [inaudible 00:14:33] and one facility that requires a plan has been inspected.

In regards to the regular inspections, Miss [inaudible 00:14:43] stated that the right to know program and selection unit performs 6,073 inspections during 2020 fiscal year. [00:15:00] 148 of these [inaudible 00:15:05] from filing, 246 were other business, and 1189 facilities were closed or there was no access granted. And 205 facilities were issues notices of violation from non-compliance with the right to know laws and regulations.

Director Mary compared the 32 submission numbers pre-covid to the current number and ascertained that they were relatively similar regarding the number of solutions received [inaudible 00:15:34]. [00:15:30] Director Meyer explained the number of response requests that has now reached 95% pre-Covid numbers, indicating that New York City is recovering and industry is returning to full operational capacity. He also explained the categories of the types of jobs those in response to. He also stated that he is happy that the few requirements are returning, the first being the St. Patrick's Day Parade [00:16:00] on March 17, 2021. 2022, I'm sorry.

Director Meyer also went over the common [inaudible 00:16:10] and opening days for both the New York Yankees and the New York Mets. Director Meyer invited us to [inaudible 00:16:21] to discuss his recent [inaudible 00:16:24] regarding the agency's sequence management plan. Mr. Carr explained that it is [00:16:30] designed as a reference document that can maintain each agency's role and operational capabilities. Mr. Carr continued to explain that he has a new role at emergency management related to public safety [inaudible 00:16:44] to start a new operational function, emergency management will be holding a partner agency meeting at the end of March to discuss it further. And that invitation will be sent out shortly.

Director Meyer announced that the next meeting is tentatively scheduled for June 14, 2022, and will [00:17:00] be combined with [inaudible 00:17:04]. In conclusion, Director Meyer asked the participants if you have any other questions or comments. Commissioner Cosgrove by Director Meyer presented a clear and concise meeting and stated that he is unsure if the NPC meeting will be held virtually or in person. Director Mayer thanked the participants for joining the meeting and expressed that he looked forward to working with everyone, [00:17:30] so that concludes the reading of the minutes.

Speaker 5: Okay, thank you Joanne. So at this point, let's move onto the tier two metrics which will be presented by Miss Jahu who is on the phone [inaudible 00:17:47]. Can you hear us?

Speaker 7: Good morning everyone.

Speaker 5: Good morning.

Speaker 7: Okay, for tier two submissions [00:18:00] and [inaudible 00:18:15].

Speaker 5: [inaudible 00:18:15]. Unfortunately, we could not hear you clearly here. I think maybe we'll have to read it from here, I'll have Joanne read the submissions because there's something wrong with the phone lines here, okay?

Speaker 7: Okay.

Speaker 5: [00:18:30] Okay, thank you Safa.

Speaker 6: [inaudible 00:18:44] on June 1st, 2022. [inaudible 00:18:44] received 11,280 tier two submissions. Of those 11,280, 296 info-socials were added to the database and submitted, that submitted 2021 the two reports. A total of 30,956 facilities [00:19:00] submitted online and 894 facilities submitted hard copy reports. [inaudible 00:19:17] then 7.1 facilities that submitted online, and 2.1 submitted hard copy reports. The Right To Know program currently has 380 risk management plans on file and an additional six facilities [inaudible 00:19:27] the Right To Know program received 65 [inaudible 00:19:32] [00:19:30] updates to the assistant management plan, and 150 affidavit vendors indicating that there was no change on their existing RNP so we see. The 29 risk management reports [inaudible 00:19:49] and as of today, three facilities have been inspected. In regards to our regular RNP inspections, the unit performed so far a total of 7,677 [00:20:00] inspections during 2020-

PART 2 OF 4 ENDS [00:20:04]

Speaker 6: ... seven inspections during the 2022 fiscal year. Out of these, 205 facilities are exempt from filing, 318 facilities were out of business, 1,520 facilities were closed and/or no access was granted, 257 facilities were issued notices of violation for non-compliance with [inaudible 00:20:27] law and regulations.

Speaker 5: Okay. [00:20:30] Thank you, Joanne. So there's a mouthful of numbers to digest. So what I usually like to do is try to put them in perspective. But before I even put anything in perspective, I need to mention something that I know each and every one of you and your department's agencies or entities must be experiencing, just like we are. Personnel issues. The Right-To-Know program is down and has been down [00:21:00] anywhere between six and eight personnel for the past year. Of course, that makes an impact on the functions that the Right-To-Know program does.

Primarily, the Right-To-Know program has to do two things in order to maintain its tier two integrity and its inspection integrity. One, we review the documents that come in by March 1st to determine accuracy. And secondly, we do inspections on facilities to make sure that what they claim on paper is what it's supposed to be, in addition [00:21:30] to making sure that they're following house-keeping protocols and keeping things safe, and basically giving them advice and guidance so that, in the event of a response, everybody's safe from the response end, that we don't walk into a [inaudible 00:21:45].

So, as I said, being that we are down personnel, we had to retool how we approach the facility council. With 11,700, or let's round it to 12,000 facilities, [00:22:00] that's a significant number of facilities to tackle. When we're at full staff, Joanne just mentioned and Mr. Wilson just mentioned, we can actually go up to 95, 96, even 97% efficiency when it comes to inspections and paperwork review. With the people being down the way we were, the way we are at this point, we have to figure what needs to be done first. We can always look at paperwork first and then do inspections. [00:22:30] But then, that doesn't really serve as being the best option. The concept of "Let me look at your operation first and work backwards" is how we took it upon ourselves this year.

So what we did was we focused a lot of our effort on inspections and then put, I would say, one third of our capability on paperwork review, two thirds on inspection. So, out of the 11,700 or so inspections, we [00:23:00] are somewhere around 9,780, 9,800 inspections here to date. So this is the first six-month window. When you look at it from this perspective, we are actually somewhere around 70 or so percent of the database inspections. So we know who's doing what, what they're doing, how they're storing it. We're reviewing it against the older paperwork, making sure things are done.

And that's a priority because, when all of our [00:23:30] facility partners pull up tier two during a response or some sort of incident, we want to make sure that that data is as accurate as it could be. So, being that we're at around 70%, the goal is now, at the end of June, to slow down inspection and now retool and go back to the paperwork review. So when we said two-third, one-third, now it's going to be two-thirds paperwork, one-third inspection. And that should carry us through to the end of the year and balance the workload [00:24:00] that we need to do.

There is actually a bright side to this. We actually just got permission from OMB to hire people. And, as of yesterday, Joanne was kind enough to print out the resumes for another six positions that we need to [inaudible 00:24:15]. So definitely, when that happens, we'll be back to where our normal operations are. But, as of now, as I said, our tier two database, which is the priority, and the inspection part of it is actually being maintained as best [00:24:30] as it could be under the circumstances. And like I said, by the end of the year, once we change our operational protocol to do the inspection part and we get new people, we'll definitely go back to where we were. So this is something that, as I said, I know



all of us experience, unfortunately, with changing work environments and offering some better positions and pay throughout the economy. This is something we're dealing with. But rest assured, we're still keeping what we have to do. So that's the Right-To-Know comment.

[00:25:00] Now, let me go on to response. I always enjoy throwing numbers out. So one of my favorite things... I love to do numbers analysis. That's a bad habit engineers do. They like to crunch numbers. So, year over year, we were, as I said... At the [inaudible 00:25:17] meeting, we said we were about 95%, year over year. So we were about 5% down. And that was in March. As of this point in June, we're actually 7% down. So it's basically the same thing, 5%, [00:25:30] 7%. Margin of error is acceptable, which indicates business is coming back.

And that means response is coming back. And that means we're getting headaches and responses every day. With the order of responses coming in as... And I'm not going to read numbers anymore because, if I read these, you're going to really get annoyed at me this morning. But let's just say it this way. Between chemical odors, petroleum spills, chemical spills, abandoned chemicals, natural gas leaks, [00:26:00] and indoor air complaints and chemical fires those are the predominant types of responses that all of us fight. So this is where we are. All the other unique things of WMDs and building collectors and PCP transfer, all those are unique. They happen, but they're not as frequent. So, as they say, business as usual. I know that sounds funny, but for us, in the response business, it's business as [00:26:30] usual.

So, it leads me to go to the next part, noteworthy responses and special deployments. Well, noteworthy responses are going to actually segue in because that's going to lead into the next item, which is the lithium ion battery discussion. But that's going to be the noteworthy responses. But before we get there, let me just present the simple summary of what special deployments we've had to date and what is expected of us, coming up before the end of summer.

For [00:27:00] 2022, the agencies, and I know many faces here, those I see on the deployment, we did New Year's Eve. We've done St. Patrick's Day. We did the United Airlines half marathon. We did the Yankees' home opener, the Mets' home opener. We did the Brooklyn Marathon, and I wanted this emphasize it's called the Brooklyn Marathon. [00:27:30] We did the five-borough bike tour. We did the Brooklyn half marathon, and we just completed the Israeli Day Parade. This weekend, we're planning to have the Puerto Rican Day Parade. So this is this Sunday. Toward the end of the month, which is the 26th, we're going to have the Pride Parade, followed by July 4th. And we're going to have a Subway Series between the Mets and the [00:28:00] Yankees on July 26th, 27, and August 22 and 23. And I'm going to stop before the US Open. That's enough for us at this point. So these are the special deployments.



Now let me switch gears and talk about noteworthy responses, and those are the ones where, of course, our colleagues at OEM... And I have to thank them first, and FDNY, for coordinating a meeting concerning lithium [00:28:30] ion batteries. I'm going to just make a very short summary because FD has better data than I have on this. But I'll just say it this way. What our regular, what we call rechargeable batteries, those that you find in scooters and wheelchairs and electrical bikes, the common everyday thing that you find, the lithium ion battery... Unfortunately, some of these batteries have caused a lot [00:29:00] of significant damage, which not only resulted in property damage but, in some cases, unfortunately, also resulted in fatalities. I've been to several of them and witnessed buildings literally just gutted because of some malfunctioning battery.

Well, this is a problem. All of us here are dealing with this one issue. How do we control these? There are really no regs here, at this point. [00:29:30] On the Right-To-Know regulations, on the federal level, the city level, they don't exist. They are very nice in saying that anything that is sold for commercial use is considered monitored, but things that are used for day-to-day operations are exempted. And now, it reads clearly, under article [inaudible 00:29:58], section 3.11, "Consumer [00:30:00] product exemption includes from reporting any- "

PART 3 OF 4 ENDS [00:30:04]

Speaker 5: " ... consumer product exemption includes from reporting any substance to the extent it is used for personal family or household purposes or is present in the same form and concentration as a product packaged for distribution and use for the general public." Nice statement. It exempts everything. Our Right-To-Know laws, our facility inventory forms, immediately get knocked out because of that one federal statement.

[00:30:30] We have done research on the DEPNS to try to find out other states who have the same problem. What did they do? This is a universal problem. It's throughout the country, everyone is trying to figure out how they can circumvent this statement. And what could you apply on a commercial basis to the bicycle shop, to the manufacturer, to the battery re-conditioner [00:31:00] or re-manufacturing process? What could you have them report? Because, right now, you see these things everywhere. They're in your local storefront. You see them on a bicycle shop. You see people bring them upstairs in apartment buildings and private homes. They're everywhere.

Do they malfunction? Unfortunately, yes. Is it a universal defect? We don't know. And I will emphasize why. [00:31:30] Just for example, on a couple of situations that we've had, just... I'm going to go backwards, chronologically backwards. This past Friday, we had a fire job. FD Hazmat was there. Sanitation, EPU was there. Scrap metal yard. Man has almost 100 batteries that they damaged, thinking that they were going to salvage the metals or whatever

they're going to profit from. That's what started a massive fire. Now we're stuck with 100 batteries [00:32:00] that are defective.

The problem with these batteries is this. There's two points of thought on this, and I'm talking a chemistry point of view, now. I'm talking like a chemist without being a chemist. People think that, "Okay, you put out the fire. It's over." These batteries have a tendency to react. So sometimes, you put them out, and then, even though you'll pack them in [00:32:30] dry absorbent, they may have some water infiltration. And guess what? The reaction starts all over again and catches up again. And then you have another secondary fire. So it's not like your regular battery that you can just put out, recycle. It has a nasty tendency to re-react, and that's what's causing us a problem. So with people not realizing that just riding a bike or a scooter on city streets, causing [00:33:00] those vibrations, those defective cracks in the casement, having water infiltration, overcharging, all of these different situations cause these fires.

Speaker 2: I'm sorry to [inaudible 00:33:17], Cliff. Do you have the numbers? About a month ago, it was something like 80 fires in the city that-

Speaker 1: It was 84 fires and four fatalities this year alone. They're already up over 100 since the meeting [inaudible 00:33:25]. No more fatalities, though.

Speaker 2: [00:33:30] And most of those, if I remember correctly are... they're not... What's the right sort of phrase for this in terms of the batteries? They're sort of bootleg batteries, right? They're ones that are-

Speaker 1: Well, yeah. Part of the bigger problem is that manufacturers that do not abide by our laws, so out-of-country manufacturers, are flooding the market [00:34:00] with funny, very legitimate-looking, as far as the labeling, batteries that have been not packaged with great quality control. And beyond that, you can take good batteries and, say, your scooter... You [inaudible 00:34:18] your scooter. You replace it. You take the batteries off of it, and you take these apart. And then they re-solder them back together to fit the new case. And they're rather industrious [00:34:30] in the way they're trying to self-recycle some of the batteries that they can use.

It's a battery, right? It doesn't have a switch on it. So they're soldering live batteries together, [inaudible 00:34:41] fires on the bench, they... This is a substantial problem. I think the one thing, for those who weren't at the meeting and aren't as familiar with this, the energy density in lithium, any of the lithium chemistries, is... We're talking the equivalent of [00:35:00] gasoline. That's how much energy these batteries put out. So it's not like, "Oh, it's just a AA battery, but there's 50 of them. It's not that big a deal." No, it's each of these cells has 10 to 15 times the energy of a standard battery that we would use. And now, there's 100 of them packed into this case, and they're damaged, and there's water intrusion. And maybe they made it themselves. And we see the amount of them with the [inaudible 00:35:26].

Speaker 2: And maybe they're daisy-chaining them in their [inaudible 00:35:29] basement, doing charging, [00:35:30] right? This is a major, major-

Speaker 1: Huge problem.

Speaker 2: Huge problem. Yeah. That's why we're talking about it.

Speaker 1: Yeah, the energy density, alone, is a massive problem.

Speaker 5: So, Commissioner, as you said, it's a major problem. And no agency, on its own, can address it. It's a multi-agency effort. Actually, there are parts of it that may go on to higher levels of government, federal levels. But in the interim, [00:36:00] waiting for the magic solution from the upper government levels is not something we can afford to wait for because these things happen every single day, unfortunately. Some are small scale, and some, unfortunately, go to the point where we have fatalities, which is a shame. Trying to remedy this causes a lot of stress on the department.

On [00:36:30] our end, DEP is entrusted under [inaudible 00:36:35] to dispose of hazardous material, which we do every day. It's part of our routine. I get calls from OEM. I get them from FD. I get them from Sanitation. We find abandoned material. We destroy it. We get it moved. But now, what happens when I say I have 50 batteries or 100 batteries, just like I have right now in this facility that we're dealing with, this scrap metal facility? [00:37:00] Now, the agency only has so many legal arms that it can stretch. Giving an order to a facility to hire a contractor is great. Threatening them with violations of \$25,000 is also great.

But then, when you have a small operation, a one- or two-person operation, who loses everything, they lost it already. What would happen in that case, when the city has to get involved, [00:37:30] and I say, "Here's an order," and the person's already lost everything? There's no insurance. The city eats the cost. That's where the fear is, when it comes to the day-to-day disposal. There is life factor, which I definitely respect. I understand the difficulties from FD's end, trying to come up with regulations, and Building Department's end, trying to come up with regulations, Sanitation's end, who's also jumping in and helping take away some [00:38:00] of these things, our end, when we're trying to get contractors to come in, and contractors actually turn away. They don't want to even store this in their facility. They know that it re-ignites.

So now, imagine I have a warehouse of chemicals, and I'm bringing this. So they'll charge you an arm and a leg to do it. If the battery, of course, is not damaged, naturally, we get a recycler. But once it's defective, burnt, in any way defective or compromised, that's it. Now, the numbers go out through the [00:38:30] roof. We have, as I said, this case, 100 batteries. Numbers are going to be in the tens of thousands to try to get someone to take it. We are, right now, trying to get the responsible party to actually go through the process of hiring someone. Now, it's a very difficult process. We do use the ability to put

liens on them. But, naturally, everyone would agree, [00:39:00] if the responsible party takes-

PART 4 OF 4 ENDS [00:39:01]