

Attachment G  
FRN Comments

## Comments from 60-Day Federal Register Notice

### **Comment 1:**

*“hazard associated with damage to high-voltage batteries is the possible release of carbon monoxide, hydrogen fluoride, and other harmful gases. Gas detection equipment can be used to check for their presence after a test, but this equipment is very expensive . The potential hazard may be managed by moving the vehicle to a well-ventilated area. A release of gas typically indicates a serious problem. Since the post-crash fire from the Chevrolet Volt test was reported by news media, IIHS has included an additional precaution and evaluation of this potential risk. Tested HEV/PEVs are stored for a period of 2 weeks in a metal storage shed located remote from the test laboratory. This minimizes the risk of collateral damage in the unlikely event of a fire. After this observation period, the vehicle's high-voltage battery is discharged per the manufacturer's recommended procedure.*

*Agencies should make public aware that electric cars not green or clean, research shows that there is a significant risk of cobalt mined by children and adults in appalling conditions in the Democratic Republic of Congo ending up in the batteries of electric cars. Workers in the DRC, earning as little as one dollar a day and at risk of fatal accidents and illness, children must not pay the price for the shift to electric cars. Should ban Electric car batteries material mined by children.*

*Fire is issue with Electric cars, In the event of any sign of fire or rising temperatures, the vehicle should immediately be moved out of the garage if it is safe to do so. This can be managed with a lift truck equipped with insulating material on its forks to shield both the lift and its operator from potential electric shock. Fire extinguishing operations should commence immediately. Extinguishing fires associated with both nickel metal hydride (Ni-MH) and lithium-ion (Li-Ion) batteries typically involves applying copious amounts of water, although there is conflicting advice amongst some manufacturers regarding how to best handle a fire event; for example, instructions for the Toyota Prius C and Prius V are to let the battery burn itself out. Regardless, as an additional precaution, it is good practice to arrange for the local fire department to be present during crash tests of HEV/PEV, especially those with Li-Ion batteries.*

*Electric Vehicles have environmental issues, Prescribe tests that simulate various environmental, mechanical, and electrical conditions that batteries and RESS can be subjected to in the automotive environment including: Vibration, Thermal shock and cycling Mechanical impact, integrity, and shock . Fire resistance , External short circuit protection , Over- and under-charge protection , Over-temperature protection Generally, the standards specify that the battery or RESS shall not leak electrolyte, rupture, catch fire, or explode when subjected to the conditions of each test. The isolation resistance is measured between the positive and negative terminals and the battery case/ground to ensure the internal integrity of the battery or RESS has not been compromised. The isolation resistance should exceed 100 /V, following procedures described in the standards.”*

**Response:**

Because this did not directly relate to the topic project, the standard CDC response was sent to the commenter.