2024

WASHINGTON STATE DIRECT PROCESSOR COMPLIANCE AUDIT[1]

Prepared for:

E-Waste, LLC

22313 70th Ave West, Suite L-4
Mountlake Terrace, WA 98043

Prepared by:

ESQ International LLC
Sydney C. Randell *CHMM, MBA*
(Woman Owned Minority Small Business)

Date:

August 14, 2024

[1] WAC 173-900-650

1.0 INTRODUCTION

ESQ International LLC (ESQI) was retained by E-Waste, LLC to perform a Washington Direct Processor Compliance audit of their electronics recycling (E-cycling) operations located at 22313 70th Ave West, Suite l-4, Mountlake Terrace, WA 98043. The on-site facility compliance audit was conducted by ESQ International LLC's auditor, Sydney C. Randell accompanied by Sam Kim, President and Paul Kim, VP of Operations of E-Waste LLC, on August 14, 2024.

2.0 PURPOSE AND SCOPE

The purpose of the audit is to assess E-Waste, LLC.'s facility operations to assess its compliance with WAC 173-900-650. The audit report is limited to observations and records reviewed from the on-site inspection conducted on August 14, 2024, and may not capture all environmental and safety compliance issues that were either not evident or may occur in the future.

3.0 SUMMARY OF AUDIT RESULTS

Please see (next section) *Washington Administrative Code 173-900-650 Facility Compliance Audit Checklist*.

Washington Administrative Code 173-900-650

Facility Compliance Audit Checklist

Facility Name: E-Waste, LLC
Facility Address: 22313 70th Ave West, Suite L-4, Mountlake Terrace, WA 98043
Facility Contact: Sam Kim, President
Facility Contact Email: sam@e-wastes.com
Facility Contact Phone No.: 425-239-4118
Facility Contact Fax No.: 425-239-4118
Facility Size (in square feet): ~12,000
Number of Employees: 9
Hours of Operation: 8:30am to 4:30pm (M-F), 8:30 – 2:30pm (Sat), closed Sundays
Applicable Waste Permit (e.g., EPA ID#): NA
Applicable Air Permit: NA. No air emissions.
Applicable Stormwater Permit: Stormwater No Exposure Certification (NEC) from Washington State Department of Ecology (CNE #2342).
F**acility Description:** The facility is located within an industrial area. The facility occupies a building with approx. 12,000 square feet of lease space.
Brief Description of Process(es): Facility collects, transports, and processes end-of-life electronic products - TVs, monitors, computers, laptops known as CEPs under the Washington Extended Producer Responsibility (EPR) program administered by WMMFA and Washington Dept. of Ecology

Minimum Performance Standards for Direct Processors – WAC 173-900-650

No.	Section	Standard [a]	Yes	No	NA	Comment
1.	Responsible Management Priorities	A direct processor must periodically evaluate its management strategies to assure it takes advantage of new more effective technologies and is otherwise continuously improving its practices and processes.	☒	☐	☐	Last management reviewon July 12, 2024.
2.	Legal Requirements	(a) A direct processor must comply with all federal, state, and local requirements and, if it exports, those of all transit and recipient countries that are applicable to the operations and transactions in which it engages related to the processing of CEPs, components, parts, and materials and disposal of residuals. These include but are not limited to applicable legal requirements relating to:	☒	☐	☐	
		(i) Waste and recyclables processing, storage, handling, and shipping; and	☒	☐	☐	Universal waste batteries and lamps were labeled & dated.
		(ii) Air emissions and wastewater discharge, including storm water discharges; and	☒	☐	☐	Valid stormwater NEC, issued by Washington State Dept of Ecology.
		(iii) Worker health and safety; and	☒	☐	☐	
		(iv) Transboundary movement of electronic equipment, components, materials, waste, or scrap for reuse, recycling, or disposal.	☒	☐	☐	
		(b) Upon request by a covered entity, a direct processor must make available information to that covered entity about any financial penalties, regulatory orders, or violations the direct processor received in the previous 3 years. If the direct processor receives subsequent penalties or regulatory orders, the direct processor must make that information available within 60 days after any subsequent penalties or regulatory orders are issued.	☒	☐	☐	None in the past 12 months.
3.	Environmental, Health, and Safety Management Systems (EHSMS)	(a) A direct processor must develop, document, fully implement, and update at least annually a written EHSMS that includes all of the following:	☒	☐	☐	Reviewed Environmental Management and Safety Management Systems documents & records.
		(i) Written goals and procedures that require the direct processor to manage its environmental, health, and safety matters systematically.	☒	☐	☐	2024 safety management system goals & targets include 0 accidents, safety training,
		(ii) Utilization of a "plan, do, check, act" model that identifies environmental aspects, implements operational controls, and provides corrective action procedures. Elements of this model must include: **(A) Plan** (I) Identification of environmental impacts, and legal andregulatory requirements;	☒	☐	☐	"PDCA" Stated in their EHSMS Policy Statement, last reviewed 7/8/2022 (rev H).
		(II) Establishment of environmental goals, objectives and targets;	☒	☐	☐	2024 EHS Goals: zero OSHA reportable. injuries, environmental training, and circular economy, recycling over 99% of materials processed.
		(III) Plan actions that work toward achieving identified goals;	☒	☐	☐	Monthly safety training records.
		(IV) Plan for emergency preparedness and response; and	☒	☐	☐	Last updated July 8,2022 (Rev. D)
		(V) Commitment of management support.	☒	☐	☐	Evident through safety training, posted safety signage, certified forklift operators, daily forklift inspections, monthly EHS facility inspections.
3.	EHSMS (continued)	**(B) Do** I) Establish roles and responsibilities for the EHSMS and provide adequate resources.	☒	☐	☐	

No.	Section	Standard [a]	Yes	No	NA	Comment
		(II) Assure that staff are trained and capable of carrying out responsibilities; and	☒	☐	☐	Universal waste, forklift operator and hazard communication training records.
		(III) Establish a process for communicating about the EHSMS within the business.	☒	☐	☐	Posted EHSMS policy statement and employee awareness training.
		(C) Check (I) Monitor key activities and track performance;	☒	☐	☐	Reviewed monthly EHS inspection & daily forklift inspection checklists.
		(II) Identify and correct problems and prevent recurrence; and	☒	☐	☐	CPANs (Corrective Prevention Action Notice) filled out and completed with corrective action.
		(III) Provide a measurement system that quantifies the application of the model.	☒	☐	☐	
		(D) Act (I) Conduct annual progress reviews;	☒	☐	☐	Last management review was July 12, 2024.
		(II) Act to make necessary changes to the EHSMS; and	☒	☐	☐	Reviewed 2024 EHSMS Objectives & Targets
		(III) Create and implement an action plan for continual improvement.	☒	☐	☐	Reviewed 2024 EHSMS Objectives & Targets in Management Review meetings.
		(iii) A worker safety and health management plan that conforms to a consensus-based standard covering worker health and safety such as ANSI Z10 or to a similarly rigorous in-house standard.	☒	☐	☐	
		(iv) A plan for responding to and reporting exceptional releases that could pose a risk to worker safety, public health, or the environment. Such releases include emergencies such as accidents, spills, fires, and explosions. The direct processor must submit this plan to all appropriate emergency responders, e.g., police, fire, hospitals.	☒	☐	☐	Written Emergency Action Plan (EAP). Observed spill kits for releaseof CRT glass, mercury lamps, and oil spills, first aid kits, and evacuation map.
		(v) A plan is conformable with ISO 14001, Institute of Scrap Recycling Industries' Recycling Industry Operating Standards ("RIOS"), the International Association of Electronic Recyclers' ("IAERs") standard, or other standards designed at a level appropriate for processing at the facility.	☒	☐	☐	Program and procedures that conforms to ISO 14001.
		(b) A direct processor must ensure all employees understand and follow the portions of the EHSMS relevant to the activities they perform.	☒	☐	☐	Universal waste training, safety training, evacuation drills.
	Preferred Performance Standards	(c) The EHSMS must also include a procedure for:	☒	☐	☐	Have written MOC worksheets for all downstream MOCs completed 7/8/2024.
		(i) Identifying and evaluating the environmental, health, and safety impacts of downstream vendors, and	☒	☐	☐	
		(ii) Utilizing the information in (a) in the selection of downstream vendors.	☒	☐	☐	
4	Recordkeeping	(a) A direct processor must maintain documentation such as commercial contracts, bills of lading, or other commercially accepted documentation for all transfers of CEPs, components, parts, materials, and residual into and out of its facilities.	☒	☐	☐	CRT glass, scrap circuit board, used lamps & used batteries shipping paper and certificate of recycling.
		(b) A direct processor must retain documents required for at least 3 years.	☒	☐	☐	Retains documents for 3years (e.g. WMMFA BOLs)
	Preferred Performance Standards	(c) The direct processor must also maintain records for any brokering transactions for at least 3 years.	☐	☐	☒	

No.	Section	Standard [a]	Yes	No	NA	Comment
5.	On-site Requirements	(a) General (i) Direct processors must take all practicable steps to maximize recycling.	☒	☐	☐	According to Management, recycle 99% of all CEPs.
		(ii) A direct processor must have the expertise and technical capability to process each type of CEP and component it accepts in a manner protective of worker safety, public health, and the environment.	☒	☐	☐	Observed safety glasses and gloves worn during dismantling.
		(iii) A direct processor must use materials handling, storage and management practices, that assure that all work and storage areas are kept clean and orderly.	☒	☐	☐	Facility is orderly and maintains a manageable level of cleanliness.
		(iv) Speculative accumulation:	☐	☒	☐	
		(A) "Speculative accumulation" means holding, storing or accumulating CEPs, components, parts, materials, or residual derived there from for more than 180 days.	☐	☒	☐	All CEPs are dismantled and MOCs are processed and recycled within 180 days.
		(B) Generators and facilities holding, storing, or accumulating CEPs, components, parts, materials, or residual derived there from for more than 180 days will be considered holding, storing, accumulating solid or hazardous waste and subject to applicable treatment, storage or disposal regulations or equivalent.	☐	☐	☒	
		(v) A direct processor must use a certified scale to weigh CEPs and components counted toward a plan's equivalent share.	☒	☐	☐	Scale last calibrated 5/22/2024.
		(b) Storage A direct processor must store materials of concern removed from CEPs, components, parts, materials, or residuals in accordance with WAC 173-900-650(11) in a manner that:	☒	☐	☐	Observed MOC's being stored inside facility.
		(i) Protects them from adverse atmospheric conditions and floods and, as warranted, includes a catchment system;	☒	☐	☐	
		(ii) Is secure from unauthorized entrance; and	☒	☐	☐	
		(iii) Is in clearly labeled containers and/or storage areas.	☒	☐	☐	
		(c) Exceptional releases posing risks A direct processor must be prepared to implement immediately the practices set forth in its EHSMS for responding to and reporting exceptional releases that could pose a risk to worker safety, public health, or the environment, including emergencies such as accidents, spills, fires, and explosions.	☒	☐	☐	
	Preferred Performance Standards	(d) Workforce and Environmental Protection (i) Hazards identification and assessment: A direct processor must conduct on an ongoing basis (as new types of CEPs, components, parts and materials are processed or new processes are utilized) a hazards identification and assessment of occupational and environmental risks that exist or could reasonably be expected to develop at the facility. Such risks could result from any sources, including but not limited to: • Emissions of and/or exposure to substances • Noise • Ergonomic factors • Thermal stress • Substandard machine guarding • Cuts and abrasions	☒	☐	☐	Manual dismantling processes for CEPs andMOCs. Observed no machinery or processesthat produced noise above WISHA action level of 85 db. Air sampling was conductedin 2019, and results were10x below WISHA PELs. Facility will conduct another air sampling by end of 2024.

No.	Section	Standard [a]	Yes	No	NA	Comment
5.	On-site Requirements (continued) **Preferred Performance Standards (continued)**	(ii) The hazards identification and assessment is captured in writing and incorporated as a component of the direct processor's EHSMS.	☒	☐	☐	
		(iii) A direct processor must manage the hazards and minimize the releases it identifies using an appropriate combination of strategies in the following order of priority: A) engineering controls, B) administrative and work practice controls, and C) personal protection equipment	☒	☐	☐	Employees wore safety glasses and gloves.
		(A) Engineering controls: (I) A direct processor must use at least one of the following: ❑ Substitution (e.g., replacing a toxic solvent with one less toxic), ❑ Isolation (e.g., automating a process to avoid employee exposure), or ❑ Ventilation and, if appropriate, capture (e.g., fume hood) and	☐	☐	☒	Observed manual disassembly processes only, no chemical or mechanicalprocesses that require ventilations.
		(II) All of the following: ❑ Dust control, capture, and clean up, and ❑ Emergency shut-off systems, and ❑ Fire suppression systems.	☒	☐	☐	Facility portable fire extinguishers.
		(B) Administrative and work practicecontrols: A direct processor must use administrative and work practice controls including appropriate combinations of:	☒	☐	☐	
		(I) Regular, documented health and safety training that covers information from the hazardous assessment, safe management handling, spill prevention, engineering controls, equipment safety, and use and care of personal protection equipment; with training for new hires and refresher courses for all employees that is understandable to them given language and level-of-education considerations,	☒	☐	☐	Reviewed safety training records.
		(II) Job rotation, as feasible, given workforce size,	☒	☐	☐	
		(III) Safe work practices,	☒	☐	☐	
		(IV) Medical monitoring,	☐	☐	☒	
		(V) Safety meetings.	☒	☐	☐	
		(C) Personal protective equipment: Includes respirators, protective eyewear, cut-resistant gloves,etc. as appropriate for the risks involved in the tasks being performed.	☒	☐	☐	Observed employees wearing safety glasses.
		(iv) A direct processor must use and document monitoring and sampling protocols according to state and federal standards and provide assurances that the practices it employs are effective and continuously managing the risks it has identified. This includes complying with all applicable Federal or State (OSHA) standards and sampling and/or monitoring protocols.	☒	☐	☐	Facility hired consultant in 2019 to conduct air sampling of LCD de-manufacturing operations. Results of mercury analysis shows well below WISHA PEL.
		(v) A direct processor must treat anyone performing activities in its facilities, using the standard of care established in this section. Direct processors are not required to provide medical monitoring for short-term, temporary and volunteer workers.	☒	☐	☐	

No.	Section	Standard [a]	Yes	No	NA	Comments
		(vi) A direct processor must designate a qualified employee or consultant to coordinate its efforts to promote worker health and safety. This individual is identified to all employees and two-way communication is encouraged between employees and this individual regarding potential hazards and how best to address them.	☒	☐	☐	Paul Kim is the designated EHS Officer and oversees EHS training, monitors employee safety practices, and performs monthly EHS facility inspections.

6.	Materials of Concern	Materials of concern must be handled according to the standards in this section. "Materials of concern" are any of the following:	☒	☐	☐	Complies with WA Dept of Ecology universal waste regulations.
		(a) Any devices, including fluorescent tubes, containing mercury or PCBs;	☒	☐	☐	Used Lamps are managed as universal waste and shipped off-site within 180 days for recycling/ retorting. Do not accept. PCBs containing materials.
		(b) Batteries;	☒	☐	☐	Used batteries are managed as universal. waste and shipped to off-site recycler/smelter.
		(c) CRTs and leaded glass; and	☒	☐	☐	Managed as recycled materials and shipped to CRT recycler and downstream EOL makes ceramic tiles.
		(d) Whole circuit boards.	☒	☐	☐	Managed as scrap commodity and shipped to downstream vendors and finally smelters.
7.	Recycling	(a) Recycling (i) A direct processor must remove from CEPs and components destined for recycling any parts that contain materials of concern that would pose a risk to worker safety, public health, or the environment during subsequent processing.	☒	☐	☐	CEPs being dismantled to components for scrap commodity or recycling by downstream vendors (e.g., refiners, smelters)
		(ii) A direct processor must remove any parts that contain materials of concern prior to mechanical or thermal processing and handle them in a manner consistent with the regulatory requirements that apply to the items, or any substances contained therein. Circuit boards and materials derived there from will be allowed to be shredded prior to separating.	☐	☐	☒	No thermal or shredding processes.
	Preferred Performance Standards	(b) Recycling: (i) A direct processor must dismantle, separate, and/or mechanically process, as appropriate, CEPs, components, and parts from which materials are to be recovered for recycling into separate "material streams" to generate value, recover materials and minimize waste, and to enable safe management through to final disposition.	☒	☐	☐	Observed LCD manual dismantling and separating of components into labeled gaylords.
8.	Reuse	(a) Reuse				
		(i) "Reuse" means any operation by which an electronic product or component of a covered electronic product changes ownership and is used, as is, for the same purpose for which it was originally purchased.	☐	☐	☒	Observed no refurbishment and/or reuse of CEPs.
		(ii) For a CEP, component or part to be put to reuse it must be fully functioning.	☐	☐	☒	
		(iii) CEPs, components and parts gleaned for reuse shall not be included in the weight totals submitted to a plan for compensation.	☐	☐	☒	

No.	Section	Standard [a]	Yes	No	NA	Comment
	Preferred Performance Standards	(b) Reuse: (i) Before shipping CEPs, components, or parts for reuse, the direct processor must:	☐	☐	☒	
		(A) Test and ensure that the CEPs, components, and parts are functioning properly for the same purpose for which they were originally purchased.	☐	☐	☒	
		(B) Accurately label, package, and ship the CEPs, components, and parts in a manner that will minimize damage during transport.	☐	☐	☒	
		(ii) A direct processor must verify a legitimate end-use market for the intended purpose of any CEPs, components or parts shipped for reuse.	☐	☐	☒	
9.	Disposal of Residuals	(a) Disposal of residuals (i) "Residuals" are leftover materials from processing CEPs, components, parts and materials. Residuals are materials that cannot be used for their original function or cannot be recycled and are sent by a processor to a disposal facility.	☒	☐	☐	Bare CRT glass, used lamps, and used batteries are shipped to downstream processors for processing and to then to EOL smelting, refining or reuse.
		(ii) Residuals must be properly designated and managed under applicable solid waste and hazardous waste laws at the location where disposal occurs.	☒	☐	☐	Used lamps and used batteries are managed as universal waste in accordance with DOE regulations (e.g., WAC 173-303)
		(iii) A direct processor must not send residuals containing materials of concern to incinerators or solid waste landfills if doing so will pose a higher risk to worker safety, public health, or the environment than alternative management strategies.	☐	☐	☒	No evidence (review of shipping records) of any MOCs being incinerated or sent to solid waste landfills.
		(iv) Residuals from processing of materials of concern must not be mixed with other residuals for the purpose of disposal.	☐	☐	☒	
	Preferred Performance Standards	(b) Residuals must be disposed of in a regulated solid waste disposal facility. Residuals containing materials of concern must be disposed in a regulated hazardous waste disposal facility.	☐	☐	☒	
10.	Refurbishment	No minimum performance standards from WAC 173-900-650.				
	Preferred Performance Standards	(a) Refurbishment: (i) A direct processor must adhere to all the performance standards in this document for all on-site activities relating to CEPs, components, and parts destined for refurbishment.	☐	☐	☒	Observed no refurbishment of CEPs or CEP components.
		(A) A direct processor must conform to all performance standards in this document for its onsite and downstream vendors' refurbishment operations, and when shipping CEPs, components, or parts to downstream vendors for refurbishment.	☐	☐	☒	
		(ii) CEPs, components and parts gleaned for refurbishment shall not be included in the weight totals submitted to a plan for compensation.	☐	☐	☒	
		(iii) A direct processor must verify a legitimate end-use market for the intended purpose of any CEPs, components or parts shipped for refurbishment.	☐	☐	☒	
11.	Transport	(a) A direct processor must ensure that all CEPs, CEP components and materials to be transported are packaged in compliance with all applicable transport laws and rules.	☒	☐	☐	Observed CEPs and CEP components stored in gaylords and containerized for safe transport.

No.	Section	Standard [a]	Yes	No	NA	Comment
	Preferred Performance Standards	(b) A direct processor must ensure all CEPs, components, parts, materials, and residuals to be transported are packaged appropriately in light of the risk they could pose during transportation to public health or the environment and the level of care warranted by their intended use.	☒	☐	☐	
		(c) A direct processor must obtain written documentation or a third-party certification indicating that their transporters have all the necessary regulatory authorizations and no significant violations of relevant legal requirements during the past 3 years.	☒	☐	☐	Self-transport and they assess transporters by running a SAFER report
12.	Prison Labor	Direct processors may not use federal or state prison labor for processing.	☒	☐	☐	No use of prison labor.
13.	Facility Access	(a) Direct processors must allow access to the facility and the documentation required in this section for the purposes of assessing compliance with the requirements in this chapter and for sampling to: (i) Ecology and ecology's designee(s);	☒	☐	☐	They always granted access to parties with credentials and is required to carry out the duties as part of WMMFA sampling and/or Dept of Ecology inspectors.
		(ii) Third-party observers for the purposes of sampling;	☒	☐	☐	
		(iii) For processors used by the standard plan: (A) The authority;	☒	☐	☐	
		(B) The authority's designee(s);	☒	☐	☐	
		(iv) For processors used by an independent plan: (A) That plan's authorized party;	☒	☐	☐	
		(B) The authorized party's designee(s) for that plan.	☒	☐	☐	
14.	Notification of Penalties and Violations	Each direct processor must notify ecology within 30 days if the direct processor receives any penalties, violations or regulatory orders related to processing activities.	☒	☐	☐	According to E-Waste LLC, no NOVs inthe last 12 months.
	Preferred Performance Standards	No additional performance standards.				
15.	Due Diligence Downstream	No minimum performance standards in WAC 173-900-650.				
	Preferred Performance Standards	(a) For materials of concern and residuals containing materials of concern a direct processor must only use downstream vendors who conform with all of the performance standards in this document.	☒	☐	☐	
		(i) A direct processor must review its downstream vendors' conformity to these standards at least every two years and more frequently as changes in circumstances warrant. The direct processor must provide the verification and documentation to Ecology upon request.	☒	☐	☐	Reviewed documents of MOC DSV (e.g., certification,

		(ii) A direct processor must document the chain of custody of all materials of concern and their residuals through final disposition. All Focus Materials (Materials of Concern) down streams through to final disposition provide the following: • Contact Info (Company Name, POC, Address, Phone,Email) • Description of material being sent (form factor - shredded, wholeunit, etc.) • Type of processing (shredding, dismantling, etc.) • End result (does it need further processing? Is it ready for reuse/disposal? Etc. • All necessary permits, certifications as defined by R2 Guidance doc p. 11 & 12 as it relates to Provision 3 - Legal Requirements • Proof of audit (some form of audit the recycler has done or purchased to validate legitimacy of the downstream processor) • Proof of shipping and receiving (not enough that they show outbound documentation, there needs to be proof of receipt-ie: signed BOL, invoice for material received, check if issuing payment, etc.)	☒	☐	☐	Reviewed documents of MOC DSV records. CRT recycler crushes and separates, and sends materials to EOL reused to make ceramic tiles.
		• Sampling of most recent shipping paperwork and validate against mass balance report. **Auditors and Direct Processors need to adhere to "Guidance for Provision 5 - R2:2013 Focus Materials (Materials of Concern)"**				
		(iii) A direct processor does not need to conduct the due diligence for downstream vendors certified to the performance standards in this document by an accredited body.	☒	☐	☐	See above
16.	Exporting	No minimum performance standards in WAC 173-900-650.				
	Preferred Performance Standards	(a) A direct processor that exports materials of concern must ensure that each transit and recipient country legally accepts such imports. For each country that is not a member of the Organization for Economic Co-operation and Development (OECD), this entails either:	☒	☐	☐	All MOCs are shipped to Tier 1 downstream recyclers in USA.
		(i) Requesting and receiving documentation, prior to shipping, from the Competent Authority of each such transit and/or import country, that clearly verifies in English that the country legally accepts such imports, or	☒	☐	☐	See above
		(ii) Requesting and receiving, prior to shipping, confirmation—that the country(ies) legally accepts such imports—from the U.S. EPA, which in turn will communicate with the other country's Competent Authority to get a determination.	☒	☐	☐	All MOCs are shipped to processors within USA.
17.	Insurance	No minimum performance standards in WAC 173-900-650.				
	Preferred Performance Standards	(a) A direct processor possesses adequate Comprehensive or Commercial General Liability Insurance including coverage for: (i) Bodily injury,	☒	☐	☐	Review Certificate of Liability Insurance valid through 8/20/2025.
		(ii) Property damage,	☒	☐	☐	
		(iii) Pollutant releases,	☒	☐	☐	Pollution Liability valid through 1/4/2025
		(iv) Accidents and	☒	☐	☐	
		(v) Other emergencies.	☒	☐	☐	
18.	Closure Plan and Financial Responsibility	No minimum performance standards in WAC 173-900-650.				

	Preferred Performance Standards	A direct processor must develop and keep current a closure plan and a sufficient financial instrument that assures proper closure of the facility and assures against abandonment of any CEPs, components, parts, materials or residuals.	☒	☐	☐	Reviewed Closure Plan and financial instrument (e.g., bank funds) for cleanup.
19	Facility Security	No minimum performance standards in WAC 173-900-650.				
	Preferred Performance Standards	A direct processor must have a functioning security program that controls access to all or parts of the processing facility in a manner and to a degree appropriate given the type of CEPs, components, parts, materials, and residuals handled and the needs of the customers served and may include such items such as indoor and outdoor lighting, secured facilities, and perimeter fencing.	☒	☐	☐	24-hour video surveillance system throughout the facility.

Table-1 – Downstream Handling of Materials of Concern (MOC) for E-Waste, LLC, Lynnwood WA

Materials of Concern	Recycling Process	Fate of Materials Recycled	Downstream Recycler(s)
Leaded CRT Glass	Manual disassembly	Raw material for producing ceramic tiles.	USA
Circuit Boards (Whole)	Manual disassembly	Precious metal refining (e.g., gold, platinum)	USA – Belgium – Japan
Used Batteries	Manual disassembly	Metal recovery (e.g.,lithium, nickel).	USA
Used Lamps containing Mercury	Manual disassembly	Retort (e.g., elementalmercury recovery)	USA
PCBs	Do not accept PCBs	Not applicable	Not applicable

4.0 AUDITOR QUALIFICATION

Sydney Randell, CHMM, MBA - He has over 34 years of Environmental, Health & Safety (EHS) professional experience across manufacturing, hazardous waste operations, metal recycling, electronics recycling, and EHS compliance and systems consulting. Mr. Randell has conducted over 500 EHS compliance, ISO 9001, ISO 14001, OHSAS 18001, ISO 45001, R2, RIOS, and downstream vendor audits (e.g., CRT recycler, circuit board refining, and toner) and otherbusiness audits in the past 22 years. Mr. Randell has a BA in Chemistry and an MBA. He is a certified ISO 14001 Lead Auditor, certified ISO 9001 Lead Auditor, certified R2 Auditor and certified Greenhouse Gas Inventory Quantifier (GHG-IQ). He has been a Certified Hazardous Materials Manager (CHMM) since 2000, and current certification is valid through 2027.