

WASHINGTON STATE DIRECT PROCESSOR PERFORMANCE STANDARDS AUDIT REPORT

August 2017

Prepared for:



**SIMON METALS, LLC
2202 E. RIVER STREET
TACOMA, WA 98421**

**SIMON METALS VANCOUVER
2401 ST. FRANCES LANE
VANCOUVER, WA 98660**

Prepared by:

Sustainable Solutions
Helping Organizations Go Green



Sustainable Solutions Consulting

821 Dock Street #Q-11

Tacoma, WA 98402

Bill Smith, Exemplar Global Certified Lead Auditor, President

EXECUTIVE SUMMARY

Under contract with Simon Metals, LLC (SM), Sustainable Solutions Consulting (SSC) performed an audit on August 11, 2017 at the SM facility in Tacoma, WA and August 16, 2017 at the Vancouver, Washington facility. The purpose of the audits were to assess the facilities conformance with Washington State Direct Performance Standards in accordance with WAC 173-900-650. The conclusion of the auditor is that both the Tacoma and Vancouver facility currently meet all minimum and preferred standards of the Washington State e-Waste Recycling Program. The Tacoma facility is currently certified to the R2:2013, ISO 14001:2015 and OHSAS 18001:2007 standards. The Vancouver facility is using the same management system documentation with minor changes for the differences in the operations and it is anticipated that the facility will be certified to the same standards within the next 6 months. The attached report presents the results and findings from the audits of both facilities.

Facility Information

Simon Metals Tacoma (SMT)

The SMT facility is a 13 acre facility that has been utilized as a scrap metal yard since 1965. The facility was deemed a superfund site in the late 1990's which included the adjacent businesses as well. The site and surrounding sites were remediated by excavating six feet of soil and placing it in berms around the sites. The berms were covered with clean fill and then paved to create an impermeable surface.

The remediation also included a drainage system covering the entire site that consists of detention ponds, catch basins and storm drain piping. Simon Metals, LLC has received a "No Further Action Needed" determination from the Department of Ecology for the superfund cleanup. The storm drain is monitored by an outside service and there have been no exceedances of permit requirements since the inception of operations.

Simon Metals Vancouver (SMV)

The SMV facility is a 55,000 sq. ft. building with all processing conducted indoors. The facility was purchased by Simon Metals in December of 2016, from IMS after their decision to leave the State of Washington. 10 key employees including the compliance manager were retained and continue to work for Simon Metals.

Simon Metals, LLC. (Vancouver) services the electronic scrap recycling needs nationwide. The reuse, recovery and disposal hierarchy for electronics is adopted for the onsite processing at our locations. All residuals are properly classified, labeled, and treated. Downstream audits are conducted of all downstream vendors, and materials of concern are tracked to their final disposition.

The SMV facility has a no exposure stormwater permit from the State of Washington and I did not observe any materials of concern stored outdoors during the audit.

Methodology

The auditor inspected the site's facilities, interviewed SM personnel, and reviewed facility records. After a brief opening meeting and review of records, the auditor went on a site tour of the facility to get an overview of the operation and observe the processes being performed. The auditor reviewed the facility's compliance with environmental performance standards for direct processors of electronic waste in Washington State.

Attendees at the opening briefing included:

- Kris Dewitt, Director of Compliance and General Manager Simon Metals, Vancouver and Corporate EHSMS Representative
- Paula Paul, Trader/Safety Director/Ecology Administrator

Table 1 presents a summary of all Washington State direct processor performance standards (minimum and preferred) and indicates whether or not the Simon Metal facilities and operations conform to each standard.

Table 1: Conformance of Tacoma and Vancouver facilities of Simon Metals. with Washington State Direct Processor Performance Standards (Minimum and Preferred).

Performance Standard	Minimum Standard	Preferred Standard
1. Responsible Management Priorities	Full	N/A
2. Legal Requirements	Full	N/A
3. Environmental, Health, and Safety Management Systems	Full	Full
4. Recordkeeping	Full	Full
5. On-site Requirements	All sections Full except (b)(iii) Partial	Full
6. Materials of Concern	Full	N/A
7. Recycling	Full	Full
8. Reuse	NA	NA
9. Disposal of Residuals	Full	Full
10. Refurbishment	N/A	NA

11. Transport	Full	Full
12. Prison Labor	Full	N/A
13. Facility Access	Full	N/A
14. Notification of Penalties and Violations	Full	N/A
15. Due Diligence Downstream	N/A	Full
16. Exporting	N/A	Full
17. Insurance	N/A	Full
18. Closure Plan and Financial Responsibility	N/A	Full
19. Facility Security	N/A	Full

Simon Metals, LLC. MOC Chart- 2017

Materials of Concern	Recycling Process	Fate of Materials Recycled	Downstream Recycler(s)
Leaded CRT Glass	Manual disassembly	Used as raw material for new CRTs (glass to glass recycling)	USA-Mexico-India
Circuit Boards	Manual disassembly	Precious metal refining (e.g. Gold, platinum)	Japan
Batteries	Manual disassembly	Metal recovery (e.g. lithium, nickel).	USA-Mexico
Mercury Devices	Manual disassembly	Retort (e.g. elemental mercury recovery)	USA
PCBs	No PCBs are intentionally handled on site	Not applicable	Not applicable

STANDARD LANGUAGE	CONFORM (Yes/No/ Partial)	COMMENTS	FUTURE ACTIONS/NON- CONFORMITIES/ OPPORTUNITIES FOR IMPROVEMENT
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1. Responsible Management Priorities

Minimum Performance Standards from WAC 173-900-650

<p>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.</p>	<p>Yes</p>	<p>Simon Metals Tacoma (SMT) has been implementing their EHSMS throughout the year. They are currently certified to R2, ISO 14001:2015 and OHSAS 18001:2007 . As part of their certification, they are required to perform annual internal audits and management reviews.</p>	<p>Reviewed management review meeting minutes dated 6-30-17 attached. Environmental Policy also requires continuous improvement.</p>
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Preferred Performance Standards

No additional performance standards.

2. Legal Requirements

Minimum Performance Standards from WAC 173-900-650

<p>(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:</p>	<p>Yes</p>	<p>SMT has the individual requirements for health and safety, dangerous waste, air and water pollution, stormwater pollution prevention, General industrial permit.</p>	<p>Attached Legal and Other Matrix is complete along with due dates on the compliance calendar. (6.1.3-F Compliance Obligations Summary List)</p>
<p>(i) Waste and recyclables processing, storage, handling, and shipping; and</p>	<p>Yes</p>	<p>Dangerous, Hazardous Waste Handling Program and Electronic Waste Safety Program. The safety program covers: Chemical hazards found in e-waste, environmental concern, dust, cuts and lacerations, noise, Required PPE, storage, ergonomics, Recordkeeping, transportation, residuals.</p>	
<p>(ii) Air emissions and waste water discharge, including storm water discharges; and</p>	<p>Yes</p>	<p>SMT is covered under the State of Washington stormwater general industrial permit . Permit Number WAR000018. Letter from DOE dated December 3, 2014 reissuing coverage under the Industrial Stormwater General Permit. SIC Code 5093.</p>	
<p>(iii) Worker health and safety; and</p>	<p>Yes</p>	<p>SMT has an accident prevention plan which covers all of the OSHA and WISHA requirements for training.</p>	<p>Audit Package attached contains Table of Contents for the SM OHS program</p>

<p>(iv) Transboundary movement of electronic equipment, components, materials, waste, or scrap for reuse, recycling, or disposal.</p>	<p>Yes</p>	<p>SMT ships circuit boards directly to smelter. These materials are under the green list provisions of the OECD and do not require permits or advance notice.</p>	<p>Downstream revue indicates that materials considered hazardous under the Basel Convention are only being sent to OECD countries with the proper permissions</p>
<p>(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 three years. If the direct processor receives subsequent penalties or regulatory orders, the direct processor must make that information available within sixty days after any subsequent penalties or regulatory orders are issued.</p>	<p>Yes</p>	<p>SMT does not have any regulatory issues, violations or financial penalties to report and is willing to comply with requirement.</p>	<p>SMT is willing to abide by this provision</p>

Preferred Performance Standards

No additional performance standards

3. EHSMS

Minimum Performance Standards from WAC 173-900-650

<p>(a) A direct processor must develop, document, fully implement, and update at least annually a written EHSMS that includes all of the following:</p> <p>(i) Written goals and procedures that require the direct processor to systematically manage its environmental, health, and safety matters.</p>	<p>Yes</p>	<p>SMT has written goals and procedures that cover the environmental health and safety matters.</p>	<p>Goals and Objectives are attached (6.2-F Objective And Targets overview)</p>
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<p>(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:</p> <p>(A) Plan</p> <p>(I) Identification of environmental impacts, and legal and regulatory requirements;</p> <p>(II) Establishment of environmental goals, objectives and targets;</p> <p>(III) Plan actions that work toward achieving identified goals;</p> <p>(IV) Plan for emergency preparedness and response; and</p> <p>(V) Commitment of management support.</p>	Yes	SMT is certified to R2, ISO 14001 and OHSAS 18001. All of these standards require conformance to a plan-do-check-act cycle.	Attached permit files contain Orion Registrar certificates.
	Yes	SMT has identified their significant OHS and environmental impacts and their legal and other regulatory requirements.	See attached 6.1.2-F for Tacoma analysis
	Yes	Goals and Objectives were set in 2016 and tracked throughout the year. Goals were discussed at Management Review meeting.	
	Yes	Action plans have been developed for achieving goals and objectives.	
	Yes	Simon has an emergency action plan	Emergency Preparedness and Response Procedure section 8.2
	Yes	SM has developed an environmental and OHS plan and policy that are signed by the President.	Other indications of management commitment and support are: Daily meetings with staff, President is attending e-waste conferences, Simon purchased the IMS Vancouver facility and subsequently hired Kris Dewitt, an experienced EHSMS representative as the corporate EHS representative and General Manager of Vancouver.

<p>(B) Do</p> <p>(I) Establish roles and responsibilities for the EHSMS and provide adequate resources;</p> <p>(III) Establish a process for communicating about the EHSMS within the business.</p> <p>(C) Check</p> <p>(I) Monitor key activities and track performance;</p> <p>(II) Identify and correct problems and prevent recurrence; and</p> <p>(III) 1) Provide a measurement system that quantifies the application of the model.</p> <p>(D) Act</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>Job Descriptions for all office employees.</p> <p>Daily morning meetings are held with management and leads from each work area.</p> <p>SM tracks production and safety performance</p> <p>Accident investigation form contains future prevention actions which are discussed at safety committee meetings. Non-conformance system is well used. All CAPA's are tracked and closed out in a timely manner.</p> <p>Accidents and production figures are tracked on a regular basis. SMT uses a DART rate for tracking accidents and production is tracked daily through the "Production Daily" form.</p>	<p>5.3-F Responsibility Matrix shows who is lead and secondary roles for the management system</p> <p>Training calendar for Tacoma shows employees and when training occurred. 7.2-F Training Needs Matrix</p> <p>Goals and Objectives were set in 2016 and tracked throughout the year. Goals were discussed at Management Review meeting. Production daily tracks inputs, outputs and amount of material processed per day.</p> <p>10.2-F Capa Report and Log 2017</p> <p>Goals and Objectives track DART rate</p>
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(I) Conduct annual progress reviews;	Yes	Management Review meeting was held on 6/30/17	Objectives and Targets Overview
(II) Act to make necessary changes to the EHSMS; and	Yes	New Objectives and Targets were established and additional staffing was assigned to the Compliance Department	
(III) Create and implement an action plan for continual improvement.	Yes	See Notes Above	
(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 department, hospitals.	Yes	SM has an Emergency Management Plan that covers earthquakes, fire, volcanic eruption. The Stormwater Pollution Prevention Plan has the Spill Prevention and Emergency Response Plan that contains the plant contacts, emergency response contacts. The plan covers mercury spills, spill prevention, Spill kit location and contents. Spill log is being kept and has eight entries for 2017.	
(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.	Yes	SM has a fully implemented and audited ISO 14001 management system	Orion Registrar Certificates- Second half permits and licenses TAC

(b) A direct processor must ensure all employees understand and follow the portions of the EHSMS relevant to the activities they perform.	Yes	SMT has a training matrix that assures all employees receive proper training for their tasks related to the EHSMS requirements	7.2-F Training Needs Matrix
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Preferred Performance Standards

(c) The EHSMS must also include a procedure for:			
(i) Identifying and evaluating the environmental, health, and safety impacts of downstream vendors, and	Yes	SMT has downstream vendor procedure (8.1.3 Focus Material and Management of Downstream)	SMT utilizes several downstream vendors for focus materials. Reviewed downstream vendor materials for each vendor.
(ii) Utilizing the information in (a) in the selection of downstream vendors.	Yes	SMT utilizes a downstream vetting procedure that is filled out by downstream vendors. The procedure is in place	Tabletop audits are done annually for each focus material vendor. SMT has a separate folder for each downstream vendor containing permits and licenses

4. Recordkeeping

Minimum Performance Standards from WAC 173-900-650

(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.	Yes	SMT has the documentation of all shipments of e-waste coming in and out of the facility.	SMT has records of all transactions since they were first approved in 2016. Reviewed records control procedure 7.4-P which requires they maintain all transaction records for three years.
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(b) A direct processor must retain documents required for at least three years.	Yes	SMT has records going back over 3 years	Sampled shipments of circuit boards, CRT tubes, hard drives and plastic. CRT shipments are occurring on a regular basis. Viewed shipment summary for 2017 to verify ongoing and regular outgoing shipments of materials.
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Preferred Performance Standards

(c) The direct processor must also maintain records for any brokering transactions for at least three years.	NA	SMT does not do any brokering transactions
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5. On-site Requirements

Minimum Performance Standards from WAC 173-900-650

<p>(a) General</p> <p>(i) Direct processors must take all practicable steps to maximize recycling.</p> <p>(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.</p>	Yes	SMT recycles 100% of the material that arrives at their facility. They also have a zero landfill policy as part of their Environmental Policy.	Tacoma facility recycles e-waste, wood pallets, aluminum cans and zero landfill for e-waste. Shrink Wrap is used to line gaylords for CRT's.
	Yes	SMT has been in business since 1935 as a scrap metal business and they have been handling e-waste since 2013. They are operating on a former superfund site and are in full compliance with their water quality permits. No air permits are required for e-waste operation.	

(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.

Yes

SMT has been in full compliance with their stormwater general industrial permit limits and has installed two onsite detention ponds that are monitored and maintained. The contractor has a mobile facility and 24 hour access to the facility in the event of an emergency. During my site visits, I observed employees sweeping and cleaning up the areas after a shredding session. The entire site is situated on impervious surfaces with all stormwater running off to the detention ponds at the front of the property. Paul Stash is the DOE employee familiar with the site. There are also numerous covered storage areas on the site which are used to store higher value materials.

(iv) Speculative accumulation:

(A) "Speculative accumulation" means holding, storing or accumulating CEPs, components, parts, materials, or residual derived therefrom for more than one hundred eighty days.

Yes

SM does not hold shredded circuit board material more than 180 days. The typical onsite time is around 30 days.

Reviewed shipping records to smelter and from Vancouver facility to Tacoma facility

<p>(B) Generators and facilities holding, storing, or accumulating CEPs, components, parts, materials, or residual derived therefrom for more than one hundred eighty days will be considered holding, storing, accumulating solid or hazardous waste and subject to applicable treatment, storage or disposal regulations or equivalent.</p>	<p>Yes</p>	<p>NA</p>	
<p>(v) A direct processor must use a certified scale to weigh CEPs and components counted towards a plan's equivalent share.</p>	<p>Yes</p>	<p>SM has two scales in use which are both certified. The large truck scale at the entrance to the facility was last certified 6/22/16 by Washington State Dept. of Agriculture under license number 25419. The smaller scale in the yard was also certified on the same date under the same license number.</p>	<p>Reviewed scale calibration certificates</p>
<p>(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:</p>	<p>Yes</p>	<p>SMT is in compliance with this area for the materials they are removing.</p>	<p>SM Tacoma is not removing Materials of Concern from the e-waste received. It is re-packed and sent whole to the Vancouver facility with the exception of circuit boards. Circuit boards are processed in Tacoma and stored in supersacks indoors.</p>
<p>(i) Protects them from adverse atmospheric conditions and floods and, as warranted, includes a catchment system;</p>	<p>Yes</p>	<p>Final shredded materials are stored in super sacks inside a building.</p>	

<p>(ii) Is secure from unauthorized entrance; and</p>	<p>Yes</p>	<p>SMT yard is secured and under 24 hour surveillance. Onsite there is a CCTV system with 18 cameras</p>	
<p>(iii) Is in clearly labeled containers and/or storage areas.</p>	<p>Partial</p>	<p>SMT is utilizing Universal Waste labels and materials in transit labels for equipment.</p>	<p>OFI- SMT should consider utilizing a recycling inventory management system that prints out labels that can be affixed to containers for easier reading of contents, dates and weights.</p>
<p>(c) Exceptional releases posing risks A direct processor must be prepared to immediately implement 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.</p>	<p>Yes</p>	<p>SMT has a Stormwater Pollution Prevention Plan (SWPPP) that covers the responses to spills and other exceptional releases. They also have an accident prevention program which covers fire and explosions</p>	<p>Reviewed spill log for 2017 and found 8 incidents none of which affected the e-scrap operations.</p>

Preferred Performance Standards

<p>(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.</p> <p>Such risks could result from any sources, including but not limited to:</p>	<p>Yes</p>	<p>SMT has developed job hazard analyses for all of their job categories. These jobs include: Maintenance, Warehouse, Laborer, Chopper. The OHS Risk Assessment table analyzes the inherent risks in the operation. 4.3.1 is hazard identification and risk. 8.1-P is the Change Management Procedure.</p>	<p>TAC4.3.1-F OHS Risk Assessment Act</p>
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<ul style="list-style-type: none"> • Emissions of and/or exposure to substances * • Noise • Ergonomic factors • Thermal stress • Substandard machine guarding • Cuts and abrasions <p>* Risks posed by exposure to substances may arise in a variety of situations – sometimes involving substances that do not under ordinary conditions pose a risk to worker safety or the environment. Such substances may include mercury, lead, beryllium, cadmium, PCBs, some phosphor compounds, certain brominated flame retardants (i.e., polybrominated biphenyls, pentabrominated diphenyl ether, and octabrominated diphenyl ether), silica dust, chlorinated or brominated dibenzodioxins and dibenzofurans, and hexavalent chromium.</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>Covered by training program</p> <p>Covered by training program</p> <p>Covered by training program</p> <p>Covered by training program</p> <p>Covered by training program</p> <p>Covered by training program</p>	<p>Topic of Health and Safety Manual</p> <p>Topic of Health and Safety Manual</p> <p>Topic of Health and Safety Manual</p> <p>Topic of Health and Safety Manual</p> <p>Topic of Health and Safety Manual</p> <p>Topic of Health and Safety Manual</p>
<p><i>Preferred Performance Standards</i></p> <p>(ii) The hazards identification and assessment is captured in writing and incorporated as a component of the direct processor’s EHSMS.</p> <p>(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:</p>	<p>Yes</p>	<p>JHA's are in writing and part of the EHSMS</p>	<p>TAC4.3.1-F OHS Risk AssessmentTAC</p>

<ul style="list-style-type: none"> • Engineering controls • Administrative and work practice controls • Personal protection equipment 	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>SMT has adopted numerous engineering controls including the use of chopper for material processing and forklifts for material handling.</p> <p>SMT has light duty work , if needed. Mats are utilized for employees who sort materials at the conveyor. Training program and procedures/work instructions are the primary administrative tools</p> <p>PPE Is utilized for hearing protection, falling objects (hard hats) and visibility (safety vests). Gloves are also utilized to handle materials to avoid cuts and abrasions from sharp objects. The PPE is covered in the Health and Safety manual.</p>	
<p>(A) Engineering controls: (I) A direct processor must use at least one of the following:</p>			
<ul style="list-style-type: none"> • Substitution (e.g., replacing a toxic solvent with one less toxic), 	<p>Yes</p>	<p>SMT does not utilize toxic materials in their e-waste processes.</p>	
<ul style="list-style-type: none"> • Isolation (e.g., automating a process to avoid employee exposure), or 	<p>Yes</p>	<p>SMT uses chopping line, forklifts and balers as automated processes for handling materials</p>	
<ul style="list-style-type: none"> • Ventilation and, if appropriate, capture (e.g., fume hood), 	<p>Yes</p>	<p>Chop Line has a cyclone dust collecton system</p>	
<p>AND (II) All of the following:</p>			

<ul style="list-style-type: none"> • Dust control, capture, and clean up, and • Emergency shut-off systems, and • Fire suppression systems. 	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>Dust collection in use at the chopper</p> <p>Chopper has an emergency shut off</p> <p>SMT has 77 fire extinguishers located throughout the facility. They are checked monthly by Advanced Safety and Fire Services.</p>	
<p>(B) Administrative and work practice controls: A direct processor must use administrative and work practice controls including appropriate combinations of:</p> <p>(I) Regular, documented health and safety training that covers information from the hazards assessment, safe materials 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,</p>	<p>Yes</p>	<p>SMT does annual training on accident prevention program, hazardous communications, dangerous waste, emergency management, Lock Out Tag Out, Heat and Cold Stress and use of PPE. New hires receive training within the first 90 days and training calendar is utilized for annual required trainings.</p>	<p>7.2-F Training Needs Matrix 2017</p>
<p>(II) Job rotation, as feasible, given workforce size,</p>	<p>Yes</p>	<p>SMT has identified the key employees who are able to handle the e-scrap. These workers move to manual dismantling, office, and forklift. SMT has also trained an alternate employee in the e-scrap operations for coverage during vacations and illnesses.</p>	

(III) Safe work practices,	Yes	Covered in Accident Prevention Program Training. Covers PPE, Ergonomics, Hazard Communications	See Table of Contents in First Half TAC
(IV) Medical monitoring,	Yes	SMT has a program that covers hearing, respirator fit tests, blood testing for lead and air quality testing for chopper. Reviewed latest Exposure Assessment report. The total metals exposure at the chopper station showed the PEL's were exceeded for a TWA 8 hour period for lead, inorganic fumes, dust and cobalt. SM implemented daily dust collection system, workers wear hairnets, respirator filters were upgraded, showers and clean coveralls are provided daily and required. Hearing tests were performed on 7/28/17. Preliminarily one employee had an STS that may have been caused by excessive ear wax. The final report is still in process.	
(V) Safety meetings.	Yes	Safety meetings are held once a month. Reviewed monthly minutes from July 2017. Old business items had action items taken the prior month noted in red and new business section has issues. Forklift drivers are	Employees were aware of safety and forklift drivers were wearing seatbelts during warehouse visit.

<p>(C) Personal protective equipment, including respirators, protective eyewear, cut- resistant gloves, etc. as appropriate for the risks involved in the tasks being performed.</p> <p>(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.</p> <p>This includes complying with all applicable Federal or State (Occupational Safety and Health Administration) OSHA standards and sampling and/or monitoring protocols.</p> <p>(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.</p>		<p>required to wear seatbelts at all times message is repeated every month.</p> <p>Yes</p> <p>SMT has documented the required PPE for each job at the facility. Full face respirators are required now when cleaning Cyclone dust collection system on the chopper.</p> <p>Yes</p> <p>SMT does hearing tests once a year, air testing twice per year and blood testing once a year for chopper employees.</p> <p>Yes</p> <p>SMT does not utilize part-time, short-term, temporary or volunteer workers at their facility.</p>	<p>Observed employees wearing PPE during site visits</p> <p>Reviewed most recent blood testing results. Both employees had lead levels well below the PEL of WAC 296-62-0751. Hearing test results were not finalized at the time of the audit but the testing had been performed.</p>
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<p>(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.</p>	<p>Yes</p>	<p>Paula Paul is the designated worker health and safety contact at SMT. All employees are aware of this.</p>	
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6. Materials of Concern

Minimum Performance Standards from WAC 173-900-650

<p>Materials of concern must be handled according to the standards in this section. "Materials of concern" are any of the following:</p> <p>(a) Any devices, including fluorescent tubes, containing mercury or PCBs;</p> <p>(b) Batteries;</p>	<p>Yes</p> <p>Yes</p>	<p>SMT does not accept loose fluorescent or PCBs. If they are received they are quarantined and the customer is requested to pick them up. SMT receives LCDs, Laptops, and monitors, the mercury bulbs are removed and shipped downstream to an approved processor</p> <p>SMT is separating laptop, cell phone and alkaline batteries from equipment and is separating button batteries from circuit boards prior to shredding</p>	
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(c) CRTs and leaded glass; and	Yes	SMT is shipping CRT's to a licensed and permitted facility . Sampled shipping documents and certificates of recycling to verify.	
(d) Whole circuit boards.	Yes	These are shredded and segregated at SMT before going to smelter and can also be segregated and shredded in Vancouver. All circuit boards are shipped out of Tacoma.	

Preferred Performance Standards

No additional performance standards.

7. Recycling

Minimum Performance Standards from WAC 173-900-650

<p>(a) Recycling</p> <p>(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.</p>	Yes	SMT removes batteries from cell phones, laptop computers and remote controls and removes button batteries from motherboards prior to shredding. Most of the dismantling occurs in the Vancouver facility.	
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<p>(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 therefrom will be allowed to be shredded prior to separating.</p>	<p>Yes</p>	<p>Materials of Concern are removed by hand at the Vancouver facility including circuit boards.</p>	
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Preferred Performance Standards

<p>(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.</p>	<p>Yes</p>	<p>SMT uses mechanical processes to process CEP's, components and parts that are handled onsite. Most equipment is sent to the Vancouver site for dismantling and separation into separate components.</p>	
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8. Reuse

Minimum Performance Standards from WAC 173-900-650

<p>(a) Reuse</p>		
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<p>(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.</p>	<p>NA</p>	<p>SMT does not reuse any CEP or component of a CEP. All material is shredded on site or sent whole to downstream processor. One exception is laptop computers which are broken in two pieces, the keyboard and the screen. The keyboard is shredded on site and the screen is sent to Farwest for recycling.</p>
<p>(ii) For a CEP, component or part to be put to reuse it must be fully functioning.</p>	<p>NA</p>	
<p>(iii) CEPs, components and parts gleaned for reuse shall not be included in the weight totals submitted to a plan for compensation.</p>	<p>NA</p>	

Preferred Performance Standards

<p>(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.</p>	<p>NA NA NA NA</p>	
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9. Disposal of Residue

Minimum Performance Standards from WAC 173-900-650

(a) Disposal of residuals

<p>(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.</p>	<p>Yes</p>	<p>SMT has a no landfill policy for materials of concern which is stated in their environmental policy. All residuals are recycled.</p>
<p>(ii) Residuals must be properly designated and managed under applicable solid waste and hazardous waste laws at the location where disposal occurs.</p>	<p>Yes</p>	<p>Residuals from the shredding process are either sent to a smelter in Japan (shredded circuit board materials), to an R2 certified facility (output from magnets in shredder line), and aluminum goes offshore for final recycling.</p>
<p>(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.</p>	<p>Yes</p>	<p>SMT does not send any residuals of materials of concern to incinerators or solid waste landfills</p>
<p>(iv) Residuals from processing of materials of concern must not be mixed with other residuals for the purpose of disposal.</p>	<p>Yes</p>	<p>SMT has a no landfill policy.</p>
<p>(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.</p>	<p>NA</p>	<p>SMT does not landfill any covered electronic products or their residuals</p>

10. Refurbishment

Minimum Performance Standards from WAC 173-900-650

No minimum performance standards from WAC 173-900-650.

Preferred Performance Standards

<p>(a) Refurbishment:</p> <p>(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.</p> <p>(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.</p> <p>(ii) CEPs, components and parts gleaned for refurbishment shall not be included in the weight totals submitted to a plan for compensation.</p> <p>(iii) A direct processor must verify a legitimate end-use market for the intended purpose of any CEPs, components or parts shipped for refurbishment.</p>	<p>NA</p> <p>NA</p> <p>NA</p> <p>NA</p>	
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11. Transport

Minimum Performance Standards from WAC 173-900-650

<p>(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.</p> <p>Preferred Performance Standards</p> <p>(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.</p> <p>(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 three years.</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>SMT receives e-scrap packaged loosely in gaylords or metal cages with plastic liner.</p> <p>Material that comes to SMT through the WMMFA program is destined for recycling. All material shipped is packaged to prevent release. Material that arrives is shrink wrapped on pallets or in closed gaylords.</p> <p>SMT utilizes their own fleet of trucks and drivers who have been trained and licensed. Reviewed US DOT Safer Database which showed that Simon Metals has a satisfactory safety rating.</p>	<p>SMT utilizes Knight Transportation for the glass shipments to TDA/TDM. Viewed Knight Transporter Checklist and Safer Report.</p>
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12. Prison Labor

<p>Minimum Performance Standards from WAC 173-900-650</p> <p>Direct processors may not use federal or state prison labor for processing.</p>	<p>Yes</p>	<p>SMT does not utilize state or federal prison labor.</p>
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No additional performance standards.

13. Facility Access

Minimum Performance Standards from WAC 173-900-650

(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:	Yes	SMT is willing to allow access to the facility and to the documentation of their management system and supporting documents
(i) Ecology and ecology's designee(s);	Yes	See comment above
(ii) Third-party observers for the purposes of sampling;	Yes	See comment above
(iii) For processors used by the standard plan	Yes	See comment above
(A) The authority;	Yes	See comment above
(B) The authority's designee(s);	Yes	See comment above
(iv) For processors used by an independent plan:	Yes	See comment above
(A) That plan's authorized party;	Yes	See comment above
(B) The authorized party's designee(s) for that plan.	Yes	See comment above

Preferred Performance Standards

No additional performance standards.

14. Facility Access

Minimum Performance Standards from WAC 173-900-650

Each direct processor must notify ecology within thirty days if the direct processor receives any penalties, violations or regulatory orders related to processing activities.	Yes	SMT is willing to notify DOE if they receive any penalties, violations or regulatory orders related to processing activities. This is a requirement of the
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		WMMFA contract which SM has already signed.
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Preferred Performance Standards

No additional performance standards.

15. Due Diligence Downstream

Minimum Performance Standards from WAC 173-900-650

No minimum performance standards in WAC 173-900-650.

Preferred Performance Standards

<p>(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.</p> <p>(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.</p>	<p>Yes</p> <p>Yes</p>	<p>SMT has downstream vetting materials for all focus material downstreams. Downstream that handles batteries is an R2 certified company as is SMT. The smelter is the final disposition point for circuit boards.</p> <p>SMT audits downstream vendors annually. Sampled audits, certificates and business licenses for all focus material downstream vendors.</p>	
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(ii) A direct processor must document the chain of custody of all materials of concern and their residuals through final disposition.	Yes	SMT has a downstream vendor map showing the chain of custody for all materials of concern.	8.1.3-F Approved Downstream Vendors WMMFA
(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.	NA	SMT is not utilizing any other Washington State processors for materials of concern.	

16. Exporting

Minimum Performance Standards from WAC 173-900-650

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:	Yes	SMT exports shredded commingled materials and CRT tubes to OECD countries. Other Materials of Concern, are sent to domestic recyclers.	SMT is in compliance with the OECD regulations and the Basel Convention for shipments of focus materials downstream.
(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	Yes	See Notes above	See Notes above

(ii) Requesting and receiving, prior to shipping, confirmation—that the country(ies) legally accepts such imports—from the United States Environmental Protection Agency, which in turn will communicate with the other country’s Competent Authority to get a determination.	Yes	See Notes Above	See Notes Above
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17. Insurance

Minimum Performance Standards from WAC 173-900-650

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:	Yes	Reviewed Acord Certificate of Liability Insurance dated 5/5/17 with an expiration of 5/5/18. Insurance coverage for Automobile Liability for \$1M and Excess Liability per occurrence of \$9M. In addition it covers WA Stop Gap Employer Liability coverage of \$1M. The policy also covers the Vancouver site.
(i) Bodily injury,	Yes	\$1 M commercial general liability, \$1M personal and injury, \$10,000 medical expenses (any one person)
(ii) Property damage,	Yes	\$300,000 Damage to rented premises

(iii) Pollutant releases,	Yes	\$2M pollution liability expires 5/5/18
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18. Closure Plan and Financial Responsibility

Minimum Performance Standards from WAC 173-900-650

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.	Yes	SMT has developed a site closure plan describing the items needed to be taken care of in the event of a closure. SMT is in the process of revising their financial instrument that complies with the new interpretation of the R2 standard which requires that all inventory of e-scrap is given zero value.	
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19. Facility Security

Minimum Performance Standards from WAC 173-900-650

No minimum performance standards in WAC 173-900-650.

Preferred Performance Standards

<p>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.</p>	<p>Yes</p>	<p>SMT has a secured facility with complete perimeter fencing and 24 hour surveillance. There are 18 CCTV cameras connected to a recording system. SM also has a caged area within the main building to house high value equipment and equipment containing data. Viewed cameras in the control center.</p>
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STANDARD	CONFORM (Yes/No/ Partial)	COMMENTS	Notes
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1. Responsible Management Priorities

Minimum Performance Standards from WAC 173-900-650

<p>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.</p>	<p>Yes</p>	<p>Simon Metals Vancouver (SMV) utilizes a written Environmental, Health and Safety Management System (EHSMS). They utilize the standard plan-do-check-act cycle to evaluate their business and the environmental policy requires continuous improvement.</p>	<p>Manual-Simon Metals LLC-Rev. C</p>
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Preferred Performance Standards

No additional performance standards.

2. Legal Requirements

Minimum Performance Standards from WAC 173-900-650

<p>(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:</p>	<p>Yes</p>	<p>SMV has the Legal and Other Requirements documented in the folder and performs and evaluation of compliance to the regulations annually.</p>	<p>6.1.3-F Compliance Obligations Summary List</p>
<p>(i) Waste and recyclables processing, storage, handling, and shipping; and</p>	<p>Yes</p>	<p>Dangerous, Hazardous Waste Handling Program and Electronic Waste Safety Program. The safety program covers: Chemical hazards found in e-waste, environmental concern, dust, cuts and lacerations, noise, Required PPE, storage, ergonomics, Recordkeeping, transportation, residuals.</p>	<p>6.1.3-F Compliance Obligations Summary List</p>
<p>(ii) Air emissions and waste water discharge, including storm water discharges; and</p>	<p>Yes</p>	<p>Vancouver-Conditional non-exposure for stormwater. No air emissions.</p>	<p>VAN-NPDES Prmit conditional no Exposure Exemption certificate exp 12-31-2019</p>
<p>(iii) Worker health and safety; and</p>	<p>Yes</p>	<p>SMV has an accident prevention plan which covers all of the OSHA and WISHA requirements for training.</p>	<p>SMV utilizes the same accident prevention and emergency response plan as SMT.</p>

<p>(iv) Transboundary movement of electronic equipment, components, materials, waste, or scrap for reuse, recycling, or disposal.</p>	<p>Yes</p>	<p>SMV is shipping glass directly to TDA which then transfers the material to Mexico and India under Competent Authority approval</p>	<p>See Competent Authority approval letter for import to Mexico and India</p>
<p>(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 three years. If the direct processor receives subsequent penalties or regulatory orders, the direct processor must make that information available within sixty days after any subsequent penalties or regulatory orders are issued.</p>	<p>Yes</p>	<p>SMV does not have any regulatory issues, violations or financial penalties to report and is willing to comply with requirement.</p>	<p>SMV is willing to abide by this provision</p>

Preferred Performance Standards

No additional performance standards

3. EHSMS

Minimum Performance Standards from WAC 173-900-650

<p>(a) A direct processor must develop, document, fully implement, and update at least annually a written EHSMS that includes all of the following:</p> <p>(i) Written goals and procedures that require the direct processor to systematically manage its environmental, health, and safety matters.</p>	<p>Yes</p>	<p>SMV has written goals and objectives that are the same at both the Tacoma and Vancouver facilities. The goals and objectives are</p>	<p>Goals and Objectives are attached (6.2-F Objective And Targets overview)</p>
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<p>(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:</p> <p>(A) Plan</p> <p>(I) Identification of environmental impacts, and legal and regulatory requirements;</p> <p>(II) Establishment of environmental goals, objectives and targets;</p> <p>(III) Plan actions that work toward achieving identified goals;</p> <p>(IV) Plan for emergency preparedness and response; and</p>		documented in the attached files	
	Yes	SMV has identified their environmental aspects, developed operational controls and a non-conformance procedure	Reviewed internal audit and management review for SMV
	Yes	SMV has identified their significant OHS and environmental impacts and their legal and other regulatory requirements.	6.1.2-F Environmental and Data Security Aspect Analysis -Vancouver
	Yes	Goals and Objectives were set in 2016 and tracked throughout the year. Goals were discussed at Management Review meeting.	
	Yes	Action plans have been developed for achieving goals and objectives.	
	Yes	Emergency Preparedness and Response Procedure section 8.2	

<p>(V) Commitment of management support.</p>	<p>Yes</p>	<p>Signed Environmental Policy. Daily meetings, attending e-waste conferences, hiring Kris Dewitt, buying Vancouver facility from IMS when they were closing and leaving the State.</p>	
<p>(B) Do</p>			
<p>(I) Establish roles and responsibilities for the EHSMS and provide adequate resources;</p>	<p>Yes</p>	<p>5.3-F Responsibility Matrix shows who is lead and secondary roles for the management system</p>	
<p>(III) Establish a process for communicating about the EHSMS within the business.</p>	<p>Yes</p>	<p>Training Matrix for SMV shows that the management system is being communicated.</p>	<p>7.2-F Vancouver Training Matrix</p>
<p>(C) Check</p>			
<p>(I) Monitor key activities and track performance;</p>	<p>Yes</p>	<p>Goals and Objectives were set in 2016 and tracked throughout the year. Goals were discussed at Management Review meeting. Production daily tracks inputs, outputs and amount of material processed per day.</p>	<p>SMV also tracks daily production levels. 9.3-F Management Review Meeting Minutes-06-30-17</p>
<p>(II) Identify and correct problems and prevent recurrence; and</p>	<p>Yes</p>	<p>Accident investigation form contains future prevention actions which are discussed at safety committee meetings.</p>	<p>Non-conformance system is well used. All CAPA's are tracked and closed out in a timely manner. 10.2-F CAPA Report & Log 2017</p>

<p>(III) I) Provide a measurement system that quantifies the application of the model.</p>	Yes	<p>Accidents and production figures are tracked on a regular basis.</p>	<p>SMV uses a DART rate for tracking accidents and production is tracked daily through the "Production Daily" form.</p>
<p>(D) Act</p>			
<p>(I) Conduct annual progress reviews;</p>	Yes	<p>Management Review meeting was held on 6/30/17</p>	<p>9.3-F Management Review Meeting Minutes-06-30-17</p>
<p>(II) Act to make necessary changes to the EHSMS; and</p>	Yes	<p>New Objectives and Targets were established and additional staffing was assigned to the Compliance Department</p>	<p>Goals and Objectives are attached (6.2-F Objective And Targets overview)</p>
<p>(III) Create and implement an action plan for continual improvement.</p>	Yes	<p>See Notes above</p>	
<p>(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 department, hospitals.</p>	Yes	<p>SMV has an Emergency Management Plan that covers earthquakes, fire, volcanic eruption.</p>	<p>Emergency Preparedness plan and Stormwater Pollution Prevention plan. VAN has had no spills in 2017. Record of emergency drill was performed 7/28-7/31 for Earthquake. Individual employees were asked what to do in the event of an earthquake and their responses were recorded. Most knew to get under a desk or stand in doorway.</p>

<p>(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.</p>	<p>Yes</p>	<p>SMV has a fully implemented ISO 14001 management system that is based on the Tacoma system with modifications for the Vancouver operation. The system is not R2 certified at this point but SMV plans to have it certified by the end of this year.</p>	
<p>(b) A direct processor must ensure all employees understand and follow the portions of the EHSMS relevant to the activities they perform.</p>	<p>Yes</p>	<p>SMV trains to all of the topics indicated on the training matrix.</p>	<p>7.2-F Vancouver Training Matrix</p>

Preferred Performance Standards

<p>(c) The EHSMS must also include a procedure for:</p> <p>(i) Identifying and evaluating the environmental, health, and safety impacts of downstream vendors, and</p> <p>(ii) Utilizing the information in (a) in the selection of downstream vendors.</p>	<p>Yes</p> <p>Yes</p>	<p>SMV has downstream vendor procedure (8.1.3 Focus Material and Management of Downstream)</p> <p>SMV utilizes a downstream vetting procedure that is filled out by downstream vendors. The procedure is in place</p>	<p>SMV utilizes SMT, Farwest and TDA/TDM, WM Lamtracker for focus materials. Reviewed downstream vendor materials for each vendor.</p> <p>SMV and SMT share the vetting information as they are utilizing the same downstream vendors for all materials of concern leaving the control of Simon Metals.</p>
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4. Recordkeeping

Minimum Performance Standards from WAC 173-900-

<p>(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.</p>	<p>Yes</p>	<p>SMV has the documentation of all shipments of e-waste coming in and out of the facility.</p>	<p>SMV has records of all transactions since they purchased the facility from IMS in December of 2016.</p>
<p>(b) A direct processor must retain documents required for at least three years.</p>	<p>Yes</p>	<p>SMV has records going back to the beginning of their ownership and operation in December of 2016.</p>	<p>Sampled shipments of circuit boards to Tacoma facility and shipments of CRT tubes to TDA/TDM. Shredded hard drives are sent to FAR West- However none of those hard drives are WMMFA material. TDA/TDM shipments are occurring on a regular basis. Viewed shipment summary for YTD 2017 to verify ongoing and regular outgoing shipments of materials.</p>

Preferred Performance Standards

<p>(c) The direct processor must also maintain records for any brokering transactions for at least three years.</p>	<p>NA</p>	<p>SMV does not do any brokering transactions</p>
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5. On-site Requirements

Minimum Performance Standards from WAC 173-900-650

<p>(a) General</p>			
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<p>(i) Direct processors must take all practicable steps to maximize recycling.</p>	<p>Yes</p>	<p>SMV recycles 100% of the material that arrives at their facility. They also have a zero landfill policy as part of their Environmental Policy.</p>	
<p>(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.</p>	<p>Yes</p>	<p>Kris Dewitt has 7 years with multi-location EHSMS systems. SMV is utilizing the old IMS Vancouver facility that was purchased December 1, 2016. 10 of the IMS employees (including Kris) remained with Simon.</p>	
<p>(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.</p>	<p>Yes</p>	<p>SMV stores all e-scrap materials either inside a warehouse or under a roofed area. Monthly facility inspections are performed for the e-scrap operation and safety committee meetings are held monthly as well.</p>	
<p>(iv) Speculative accumulation: (A) "Speculative accumulation" means holding, storing or accumulating CEPs, components, parts, materials, or residual derived therefrom for more than one hundred eighty days.</p>	<p>Yes</p>	<p>SMV does not hold shredded circuit board material more than 180 days. The typical onsite time is between 30- 60 days.</p>	

<p>(B) Generators and facilities holding, storing, or accumulating CEPs, components, parts, materials, or residual derived therefrom for more than one hundred eighty days will be considered holding, storing, accumulating solid or hazardous waste and subject to applicable treatment, storage or disposal regulations or equivalent.</p>	<p>Yes</p>	<p>See Above</p>	
<p>(v) A direct processor must use a certified scale to weigh CEPs and components counted towards a plan's equivalent share.</p>	<p>Yes</p>	<p>SMV is using certified scales that were last certified 12/2/16. Certificates in audit file.</p>	
<p>(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:</p>	<p>Yes</p>	<p>SMV is in compliance with this area for the materials they are removing.</p>	
<p>(i) Protects them from adverse atmospheric conditions and floods and, as warranted, includes a catchment system;</p>	<p>Yes</p>	<p>SMV stores all e-scrap materials either inside a warehouse or under a roofed area.</p>	
<p>(ii) Is secure from unauthorized entrance; and</p>	<p>Yes</p>	<p>SMV yard is secured and under 24 hour surveillance monitored by the Port of Vancouver. Port security drives the area during the night hours.</p>	
<p>(iii) Is in clearly labeled containers and/or storage areas.</p>	<p>Partial</p>	<p>SMV is utilizing Universal Waste labels and materials in transit labels for equipment. Weights are written on the pallets when</p>	<p>Consider developing an inventory management system with more permanent labeling for containers</p>

<p>(c) Exceptional releases posing risks A direct processor must be prepared to immediately implement 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.</p>	<p>Yes</p>	<p>they are weighed during the receiving process</p> <p>SMV has an Emergency Action Plan which covers spill response and other potential emergencies</p>	
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Preferred Performance Standards

<p>(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.</p> <p>Such risks could result from any sources, including but not limited to:</p> <ul style="list-style-type: none"> Emissions of and/or exposure to substances * 	<p>Yes</p> <p>Yes</p>	<p>SMV has developed job hazard analyses for all of their job categories. These jobs include: Maintenance, Warehouse, Laborer, Chopper. The OHS Risk Assessment table analyzes the inherent risks in the operation. 4.3.1 is hazard identification and risk. 8.1-P is the Change Management Procedure.</p> <p>Covered by training program</p>	<p>4.3.1-F VAN Overview OHS</p> <p>Topic of Health and Safety Manual</p>
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<ul style="list-style-type: none"> • Noise • Ergonomic factors • Thermal stress • Substandard machine guarding • Cuts and abrasions <p>* Risks posed by exposure to substances may arise in a variety of situations – sometimes involving substances that do not under ordinary conditions pose a risk to worker safety or the environment. Such substances may include mercury, lead, beryllium, cadmium, PCBs, some phosphor compounds, certain brominated flame retardants (i.e., polybrominated biphenyls, pentabrominated diphenyl ether, and octabrominated diphenyl ether), silica dust, chlorinated or brominated dibenzodioxins and dibenzofurans, and hexavalent chromium.</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>Covered by training program</p> <p>Covered by training program</p> <p>Covered by training program</p> <p>Covered by training program</p> <p>Covered by training program</p>	<p>Topic of Health and Safety Manual</p> <p>Topic of Health and Safety Manual</p> <p>Topic of Health and Safety Manual</p> <p>Topic of Health and Safety Manual</p> <p>Topic of Health and Safety Manual</p>
<p><i>Preferred Performance Standards</i></p> <p>(ii) The hazards identification and assessment is captured in writing and incorporated as a component of the direct processor’s EHSMS.</p> <p>(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:</p> <ul style="list-style-type: none"> • Engineering controls 	<p>Yes</p> <p>Yes</p>	<p>The OHS assessment is in writing and is a component of the EHSMS.</p> <p>SMV has adopted numerous engineering controls including the use of shredder, dust collection system, forklifts.</p>	<p>4.3.1-F VAN Overview OHS</p>

<ul style="list-style-type: none"> • Administrative and work practice controls • Personal protection equipment 	<p>Yes</p> <p>Yes</p>	<p>Training program and procedures/work instructions are the primary administrative tools.</p> <p>PPE is utilized for hearing protection, falling objects (hard hats) and visibility (safety vests). Gloves and sleeves are also utilized to handle materials to avoid cuts and abrasions from sharp objects. Steel toed shoes are also required as are safety glasses. The PPE is covered in the Health and Safety manual.</p>	
<p>(A) Engineering controls:</p> <p>(I) A direct processor must use at least one of the following:</p> <ul style="list-style-type: none"> • 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), <p>AND</p> <p>(II) All of the following:</p> <ul style="list-style-type: none"> • Dust control, capture, and clean up, and 	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>SMV does not utilize toxic materials in their e-waste processes.</p> <p>SMV uses a shredder, forklifts and balers as automated processes for handling materials</p> <p>There is a dust collection system for the shredder.</p> <p>Dust collection in use at the shredder</p>	

- Emergency shut-off systems, and
- Fire suppression systems.

(B) Administrative and work practice controls:

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 hazards assessment, safe materials 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,

(II) Job rotation, as feasible, given workforce size,

(III) Safe work practices,

Yes

Shredder and Baler have emergency shut offs

Yes

SMV has fire extinguishers located throughout the facility and an eyewash station. They are checked monthly by SMV staff.

Yes

SMV does annual training on accident prevention program, hazardous communications, dangerous waste, emergency management, Lock Out Tag Out, Heat and Cold Stress and use of PPE.

New hires receive training on the first day of hire and training calendar is utilized for annual required trainings.

Yes

Workers move to manual dismantling of LCD, Large Devices, CRT, Battery Station. NOTE: Study shows that variation in material and use of tools, movement at benches is varies throughout the day. No repetitious jobs.

Yes

Covered in Accident Prevention Program Training. Covers PPE,

(IV) Medical monitoring,

Yes

Ergonomics, Hazard
Communications

SMV has a program that covers hearing. Hearing test will be performed in December of 2017. Last hearing was conducted in 2016 when the facility was owned by IMS. Processes have not changed since the 2016 test so earlier testing is not required. Test results indicated that any exposure to the warehouse for more than two hours would require hearing protection. That rule is in place and being enforced.

(V) Safety meetings.

Yes

Safety meetings are held once a month. Reviewed monthly minutes from July 2017. Minutes consisted of a review of the incidents from the prior month and their root causes. New business items were discussed and assignments for follow up made.

(C) Personal protective equipment, including respirators, protective eyewear, cut-resistant gloves, etc. as appropriate for the risks involved in the tasks being performed.

Yes

SMV has documented the required PPE for each job at the facility. Observed employees wearing PPE during site visits and I was required to wear safety vest, safety glasses, hard hat and solid toed shoes before entering the warehouse.

(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.

Yes

SMV does hearing tests once a year. See note above for more details

This includes complying with all applicable Federal or State (Occupational Safety and Health Administration) OSHA standards and sampling and/or monitoring protocols.

(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.

Yes

SMV has one temporary worker at the facility and may employ up to two. Temporary workers are required to have the same training and utilize the same tools and equipment as full-time employees.

<p>(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.</p>	<p>Yes</p>	<p>Kris Dewitt is the designated health and safety person at the SMV facility</p>	
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6. Materials of Concern

Minimum Performance Standards from WAC 173-900-650

<p>Materials of concern must be handled according to the standards in this section. "Materials of concern" are any of the following:</p> <p>(a) Any devices, including fluorescent tubes, containing mercury or PCBs;</p>	<p>Yes</p>	<p>SMV does not accept loose fluorescent or PCBs. If they are received they are quarantined and the customer is requested to pick them up. SMT receives LCDs, Laptops, and monitors, the mercury bulbs are removed and shipped downstream to an approved processor</p>	
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	Yes	SMV is separating laptop and alkaline batteries from equipment. Cell phones have batteries removed prior to acceptance by SMV. The button batteries are taped and sent to approved downstream vendor Farwest Recycling	
(b) Batteries;	Yes	SMV is shipping CRT's to TDA/TDM . Sampled shipping documents and certificates of recycling to verify.	
(c) CRTs and leaded glass; and	Yes	These are shredded and segregated at SMV before going to Tacoma for further processing. All circuit boards are shipped out of Tacoma.	
(d) Whole circuit boards.			

Preferred Performance Standards

No additional performance standards.

7. Recycling

Minimum Performance Standards from WAC 173-900-650

(a) Recycling			
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<p>(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.</p>	<p>Yes</p>	<p>SMV is removing batteries from laptop computers and remote controls and removes button batteries from motherboards prior to shredding. CRT's are dismantled into glass and plastic and wire. Glass tubes are sent whole to TDA/TDM. Desktop computers have the circuit boards removed and the remainder is shredded. Laptops have the circuit boards removed, the battery and the screen is broken to remove the mercury if present. The remainder is sent to Tacoma. Flat panels are disassembled, the mercury is removed and the circuit board is removed and the balance is run through the shredder.</p>	
<p>(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 therefrom will be allowed to be shredded prior to separating.</p>	<p>Yes</p>	<p>Materials of Concern are removed by hand at the Vancouver facility including circuit boards. See notes above</p>	

Preferred Performance Standards

<p>(b) Recycling:</p> <p>(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.</p>	Full	SMV uses hand dismantling processes to process CEP's, components and parts as described above. Laptop bodies and screens with mercury removed and circuit boards are sent to Tacoma for final processing and shipment to smelter.	
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8. Reuse

Minimum Performance Standards from WAC 173-900-650

<p>(a) Reuse</p> <p>(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.</p> <p>(ii) For a CEP, component or part to be put to reuse it must be fully functioning.</p> <p>(iii) CEPs, components and parts gleaned for reuse shall not be included in the weight totals submitted to a plan for compensation.</p>	NA	SMV does not reuse any CEP or component of a CEP from WMMFA material. All WMMFA material is dismantled on site and sent to downstream processors per the attached downstream processor list.
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Preferred Performance Standards

<p>(b) Reuse:</p> <p>(i) Before shipping CEPs, components, or parts for reuse, the direct processor must:</p>	NA	
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(A) Test and ensure that the CEPs, components, and parts are functioning properly for the same purpose for which they were originally purchased.	NA	
(B) Accurately label, package, and ship the CEPs, components, and parts in a manner that will minimize damage during transport.	NA	
(ii) A direct processor must verify a legitimate end-use market for the intended purpose of any CEPs, components or parts shipped for reuse.	NA	

9. Disposal of Residue

Minimum Performance Standards from WAC 173-900-650

(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.	Yes	SMV has a no landfill policy for materials of concern which is stated in their environmental policy. All residuals are recycled per the downstream vendor chart..
(ii) Residuals must be properly designated and managed under applicable solid waste and hazardous waste laws at the location where disposal occurs.	Yes	Residuals from the shredding process at SMV are either sent to a smelter in Japan (shredded circuit board materials), to an R2 certified facility in Oregon (output from magnets in shredder line), and aluminum goes to Japan for final recycling.

<p>(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.</p>	<p>Yes</p>	<p>SMV does not send any residuals containing materials of concern to incinerators or solid waste landfills</p>
<p>(iv) Residuals from processing of materials of concern must not be mixed with other residuals for the purpose of disposal.</p>	<p>Yes</p>	<p>SMV has a no landfill policy.</p>
<p>(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.</p>	<p>NA</p>	<p>SMV does not landfill any covered electronic products or their residuals. Glass from Projection TV's is currently sent for disposal but SMV is looking at alternative recycling options.</p>

10. Refurbishment

Minimum Performance Standards from WAC 173-900-650

No minimum performance standards from WAC 173-900-650.

Preferred Performance Standards

<p>(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.</p>	<p>NA</p>	
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(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.	NA	
(ii) CEPs, components and parts gleaned for refurbishment shall not be included in the weight totals submitted to a plan for compensation.	NA	
(iii) A direct processor must verify a legitimate end-use market for the intended purpose of any CEPs, components or parts shipped for refurbishment.	NA	

11. Transport

Minimum Performance Standards from WAC 173-900-650

(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.	Yes	SMV receives e-scrap packaged loosely in gaylords or metal cages with plastic liner. Outgoing materials are sent in gaylords and are shrink wrapped at the top and stored indoors until loaded on a truck for transport. All shipments of batteries and CRT glass are properly labeled per the WISHA and DOT regulations.	All material shipped is packaged to prevent release. Material that arrives is shrink wrapped on pallets or in closed gaylords.
Preferred Performance Standards			

<p>(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.</p>	<p>Yes</p>	<p>Material that goes from SMV is destined for recycling so none of the equipment has been packaged for reuse. Materials are appropriately packaged for shipment for recycling. CRT tubes are loaded into gaylords whole so it is possible that they will break during transit but that is their final disposition.</p>	
<p>(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 three years.</p>	<p>Yes</p>	<p>SMV utilizes their own fleet of trucks and drivers who have been trained and licensed. Reviewed US DOT Safer Database which showed that Simon Metals has a satisfactory safety rating. WMMFA materials are transported by companies approved and contracted to WMMFA.</p>	<p>SM utilizes Knight Transportation for the glass shipments to TDA/TDM. Viewed Knight Transporter Checklist and Safer Report.</p>

12. Prison Labor

<p>Minimum Performance Standards from WAC 173-900-650</p> <p>Direct processors may not use federal or state prison labor for processing.</p>	<p>Yes</p>	<p>SMV does not utilize state or federal prison labor for processing</p>
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No additional performance standards.

13. Facility Access

Minimum Performance Standards from WAC 173-900-650

(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:	Yes	SMV is willing to allow access to the facility and to the documentation of their management system and supporting documents
(i) Ecology and ecology's designee(s);	Yes	See comment above
(ii) Third-party observers for the purposes of sampling;	Yes	See comment above
(iii) For processors used by the standard plan	Yes	See comment above
(A) The authority;	Yes	See comment above
(B) The authority's designee(s);	Yes	See comment above
(iv) For processors used by an independent plan:	Yes	See comment above
(A) That plan's authorized party;	Yes	See comment above
(B) The authorized party's designee(s) for that plan.	Yes	See comment above

Preferred Performance Standards

No additional performance standards.

14. Facility Access

Minimum Performance Standards from WAC 173-900-650

Each direct processor must notify ecology within thirty days if the direct processor receives any penalties, violations or regulatory orders related to processing activities.	Yes	SMV is willing to notify DOE if they receive any penalties, violations or regulatory orders related to processing activities. This is a requirement of the WMMFA contract which SMV has already signed.
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Preferred Performance Standards

No additional performance standards.

15. Due Diligence Downstream

Minimum Performance Standards from WAC 173-900-650

No minimum performance standards in WAC 173-900-650.

Preferred Performance Standards

<p>(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.</p>	<p>Yes</p>	<p>SMV has downstream vetting materials for all focus material downstreams. Farwest Recycling that handles batteries is an R2 certified company as is SMT location. The smelter is the final disposition point for circuit boards.</p>	
<p>(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.</p>	<p>Yes</p>	<p>SMV audits downstream vendors annually. Sampled audits, certificates and business licenses for all focus material downstream vendors.</p>	
<p>(ii) A direct processor must document the chain of custody of all materials of concern and their residuals through final disposition.</p>	<p>Yes</p>	<p>SMV has a downstream vendor map showing the chain of custody for all materials of concern.</p>	

<p>(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.</p>	<p>NA</p>	<p>SMV is not utilizing any other Washington State processors. Farwest Recycling in Oregon is R2 certified by an accredited body and TDA/TDM process is also R2 certified via Cali Resources. WM Lamptacker is not certified but all of the required vetting materials are in the SMV downstream files</p>	
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16. Exporting

Minimum Performance Standards from WAC 173-900-650

No minimum performance standards in WAC 173-900-650.

Preferred Performance Standards

<p>(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:</p>	<p>Yes</p>	<p>SMV exports shredded commingled materials to Tacoma which sends them to Japan which is an OECD country. Other Materials of Concern, are sent to Farwest in Oregon (Batteries) for domestic recycling or to TDA/TDM (CRT Tubes) in Mexico.</p>	<p>SM is in compliance with the OECD regulations and the Basel Convention for shipments of focus materials downstream. No glass shipments were sent to Mexico until the new Acknowledgement of Consent was received by TDM from the Mexican Competent Authority.</p>
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<p>(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</p>	<p>Yes</p>	<p>See Notes Above</p>	
<p>(ii) Requesting and receiving, prior to shipping, confirmation—that the country(ies) legally accepts such imports—from the United States Environmental Protection Agency, which in turn will communicate with the other country’s Competent Authority to get a determination.</p>	<p>Yes</p>	<p>See Notes Above</p>	

17. Insurance

Minimum Performance Standards from WAC 173-900-650

No minimum performance standards in WAC 173-900-650.

Preferred Performance Standards

<p>(a) A direct processor possesses adequate Comprehensive or Commercial General Liability Insurance including coverage for:</p>	<p>Yes</p>	<p>Reviewed Acord Certificate of Liability Insurance dated 5/5/17 with an expiration of 5/5/18. Insurance coverage by Continental Western Insurance Company. In addition to commercial general liability, the policy covers Automobile Liability for \$1M and Excess Liability per occurrence of \$9M. In addition it covers WA Stop Gap Employer Liability</p>
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		coverage of \$1M. The policy also covers the Vancouver site.
(i) Bodily injury,	Yes	\$1 M commercial general liability, \$1M personal and injury, \$10,000 medical expenses (any one person) \$300,000 Damage to rented premises \$2M pollution liability Crum and Forster expires 5/5/18
(ii) Property damage,	Yes	
(iii) Pollutant releases,	Yes	

18. Closure Plan and Financial Responsibility

Minimum Performance Standards from WAC 173-900-650

No minimum performance standards in WAC 173-900-650.

Preferred Performance Standards

<p>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.</p>	<p>Partial</p>	<p>SMV has developed a site closure plan describing in words the items needed to be taken care of in the event of a closure.</p>	
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19. Facility Security

Minimum Performance Standards from WAC 173-900-650

No minimum performance standards in WAC 173-900-650.

Preferred Performance Standards

<p>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.</p>	<p>Yes</p>	<p>SMV has a secured facility with complete perimeter fencing and 24 hour surveillance through the Port of Vancouver. SMV also has a caged area within the main building to house high value equipment and equipment containing data.</p>
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