

Environmental, Health and Safety Compliance  
and System EHSMS Audit in Response to:

Washington State Preferred Performance  
Measures for Direct Processors

WAC 173-900-650

Facilities Audited: Metro Metals Northwest Inc.  
Vancouver, WA and Tacoma, WA  
Auditors: Kelley Keogh, Emily Farrant  
Date: December 7<sup>th</sup> and 9<sup>th</sup>, 2021

### **Scope of Audit**

This audit was designed to meet the specific requirements of the State of Washington's "Environmentally Sound Management Performance Measures for Direct Processors – Preferred Status" qualification requirements. The WA State Standards, WAC 173-900-650. These were interpreted, and a facility checklist was prepared to meet the standards requirements that related directly to the operations. The audit consisted of confirming the nexus between the two documents and the operations.

The ISO system manages non-conformances with the CAPA process. All the issues that have been identified will be managed appropriately to resolution and to prevent recurrence.

The two sites that were audited were:

Metro Metals Northwest Inc. facility located at 2401 St. Francis Ln, Vancouver, WA 98660 and was performed December 9<sup>th</sup>, 2021.

Metro Metals Northwest Inc. facility located at 2202 East River St., Tacoma, WA 98421 and was performed December 7<sup>th</sup>, 2021.

The facilities are well run and operating efficiently. Metro Metals demonstrated proficiency in their job duties and the management system in general. The Metro Metals staff demonstrated strong commitment to the management systems and the overall EHS performance of the company.

### **Audit Summary**

The following is a summary of a comprehensive review for compliance of operations in response to the Washington State Department of Ecology Preferred Performance Standards for Direct Processors of Electronics Processors - WAC 173-9000.

#### **1. Responsible Management Priorities – *Facility Maintains Compliance with Standards***

Inherent in the ISO 14001:2015, ISO 45001:2018, and R2:2013 Standards, which is what this company utilizes as an EHSMS, is the continuous improvement of operations through management and operation's evaluations.

#### **2. Legal Requirements – *Facility Maintains Compliance with Standards***

Both facilities use the EPA website, OSHA website, governmental websites, consultants to identify local, state, federal and international regulations. An external audit of compliance is completed every two years by a third party. Internal audits are completed annually, and the certification bodies do an annual surveillance audit as well.

At the WA facility material continues to be managed under Fed UW regulations and WA regulations. The company agrees to be completely transparent with the WM DOE regarding non-compliant events. This is added to the Compliance Obligations Summary List at both facilities.

**3. Environmental, Health, and Safety Management System EHSMS - Facility Maintains Compliance with Standards**

Metro Metals Northwest Inc. is certified to ISO 14001:2015, and ISO 45001:2018. These are internationally recognized standards of excellence in Environmental, Health and Safety Management Systems. The company wide EHSMS is audited and updated, as new procedures are implemented, or as new materials is accepted. The EHSMS contains a diligent “Plan, Do, Check” component, which manages change and issues through constant management review. The system is 3<sup>rd</sup> party reviewed annually during surveillance audits required by these certifications.

**4. Recordkeeping – Facility Maintains Compliance with Standards**

Records are managed well as noted during the audits and all material downstream dispositions to final destinations were confirmed through the R2 audit certification processes, which also meet the WA DOE requirements.

The Metro Metals software tracking program called Scale It, the Approved Downstream Vendors spreadsheets, as well as BOLs are used for tracking materials to final destination. See Att 01 Approved Downstream Vendors 2021 TAC and VAN and the two tabs (VAN and TAC) for tracking of material to EOL.

**5. On-site requirements - Facility Maintains Compliance with Standards**

The auditor observed material handled per regulations and using acceptable industry standards. Housekeeping and material management was on par to industry standards. Material is inventoried and moved quickly throughout and managed in a database to ensure that none is kept over 12 months. Facility scales at both sites have been calibrated and certified. Materials of Concern are not stored outside, and the security is adequate with visitor sign in, perimeter fencing, CCTV and 24/7 security guards. Worker safety is protected through training, OSHA required safety programs and housekeeping practices. Risk assessments have been done for each job station and auditor can verify that the appropriate PPE is worn. The health and safety training is consistent with requirements for the operation and the facility. IH monitoring and medical reviews have been conducted.

For the Vancouver facility, IH air monitoring was completed in 2014 for lead, cadmium, mercury, aluminum, arsenic, barium, chromium, copper, phosphorus, silver, hexavalent chromium, and results were well below OSHA PELs. Per the POC the operations and material being shredded have not changed. Metro Metals has not scheduled IH air monitoring again.

At the Tacoma facility, IH monitoring was completed by Mike McKay from Orion Environmental services on 04-24-20, recommendations were to wear half face respirators. Reviewed respirator program in the Health and Safety Manual dated 06-21-21. Fit testing is completed by Franciscan Port Clinic.

**6. Materials of Concern - Facility Maintains Compliance with Standards**

The CB auditors observed Materials of Concern (MOC) being handled in accordance with standards (See Att 01 Approved Downstream Vendors 2021 TAC and VAN and the two tabs (VAN and TAC). The auditors verified that all downstream vendors for MOC's handle material per the WA State DOE Standards. Comprehensive on-site audits were reviewed by the CB auditor while on site and found to be well managed and detailed. Metro Metals agrees to notify the WA State DOE of vendor changes for all MOC's and will build this into their QEHSMS.

**7. Recycling - Facility Maintains Compliance with Standards**

Materials are managed to ANSI and OSHA standards - observed during the site visit. Auditor observed dismantling and separation at Metro Metals which is an end-of-life e-waste recycler.

[REDACTED]

**8. Reuse - Facility Maintains Compliance with Standards**

Metro Metals is an end-of-life e-waste recycler. Only a select amount of used electronics is sent out to [REDACTED] an R2 certified company, for reuse.

**9. Disposal of Residuals - Facility Maintains Compliance with Standards**

Facility waste management follows state and federal guidelines as observed by the certification auditors. No materials of concern go to non-HW landfills or incineration. Site waste is managed and separated to minimize material going to landfill and nothing from the recycling process goes to the landfill. Facilities do not generate HW. Dust is sent to refineries for recovery of precious metals. HT Pallets are reused, and non-HT pallets are sold for reuse.

**10. Refurbishment - Facility Maintains Compliance with Standards**

See reuse section.

**11. Transport – Facility Maintains Compliance with Standards**

Tacoma uses all internal Metro Metals trucking. Vancouver uses Metro Metals trucking and 3<sup>rd</sup> Party. Third party trucking companies used by the facilities go through a transportation audit that includes, insurance requirements, ownership and company identification and annual vendor form updates. The auditor has reviewed all three approved outsourced transporters and completed audits.

**12. Prison Labor – Facility Maintains Compliance with Standards**

Metal Metals does not use prison labor.

**13. Facility Access – Facility Maintains Compliance with Standards**

Metal Metals allows WA State DOE full record and site access – auditor discussed with management team.

**14. Notification of Penalties and Violations – Facility Maintains Compliance with Standards**

Metal Metals agrees to notify the WA DOE within 30 days if they receive a Notices of Violation at the facilities included in this audit. The facility has listed this requirement into the Compliance Obligations Summary List, to manage.

**15. Due Diligence Downstream - Facility Maintains Compliance with Standards**

Metro Metals has implemented comprehensive audit criteria for downstream vendor audits in order to assure that they are compliant with all applicable international, US, EU and WA State DOE Standards. All current vendors have been audited and the CB auditors reviewed the documents for completion and compliance with the R2 standard during the certification audits. Metro Metals' audit protocol also includes the WA State DOE MOC's handling requirements as well.

**16. Exporting – Facility Maintains Compliance with Standards**

As confirmed during the R2 certification audits, Metro Metals is following WA DOE and FED EPA standards as the final destination for the CRT glass is [REDACTED], an OECD country that allows clean, separated CRT glass into the country as a commodity for recycling. Circuit boards are sent to [REDACTED] and the facility has audits of these facilities on file, which were reviewed by the CB auditors during the certification audits.

**17. Insurance - Facility Maintains Compliance with Standards**

Metro Metals holds the following insurances, which are valid through 7/01/2022.

General Liability: \$1,000,000 each occurrence / \$2,000,000 General Aggregate

Automobile Liability: \$1M

Umbrella Liability: \$10,000,000 Each occurrence / \$10,000,000 Aggregate

Worker's Compensation: Certificate from the State of Washington which expires 10-26-22

Pollution Liability: \$5,000,000 General Aggregate expires 03-01-22

**18. Closure QEHSMS and Financial Responsibility - Facility Maintains Compliance with Standards**

As noted during the certification audits:

**Tacoma** - Reviewed the Closure Cost estimate worksheet dated 10-11-21 in the amount \$48,952.00. A letter of guarantee from the landlord of the property (Farmount Tacoma LLC) has been established to cover the cost of closure. Reviewed Closure Plan dated 11-20-20 which includes instructions and a timeline for completion.

**Vancouver** - Reviewed the Closure Cost estimate worksheet dated 10-11-21 in the amount \$53,847.20. A letter of guarantee from the landlord of the property (Farmount Tacoma LLC) has been established to cover the cost of closure. Reviewed Closure Plan dated 11-20-20 which includes instructions and a timeline for completion.

**19. Facility Security - Facility Maintains Compliance with Standards**

Facility security includes: company's yard is fully fenced, with gates and locked after hours, only authorized employees are given key access to the facility after hours. The facility is under 24-hour surveillance through CCTV cameras by Kastle Systems. Fifteen cameras are located throughout the facility. CCTV area's cover both internal and external views. Any data secure area that has any entrance or exit is in full view of a camera. All visitors and contractors must sign in and out at the front desk. Visitors and contractors are always escorted or under the supervision of an employee while in the building. All buildings and data bearing equipment are kept locked and under surveillance when not attended. Material picked up by Metro Metals is

received and transported in secured (locked) trailers until dropped off in the company yard. All trailers are sealed for delivery to downstream vendors, and only the downstream vendor can remove the seal. All records are backed up by Quest Rapid Recovery to Servers replicated to Data Center (Secured Tunnel to Data Center), with WatchGuard T70 firewalls by Dynamic Computing.

Metro Metals Northwest Inc. Vancouver, WA and Tacoma, WA are both well-managed sites and the company has a commitment of working towards excellence in their operations and transparency and compliance with all regulatory bodies. The management team shows a strong commitment to the principles of the EHSMS and have designated above average resources to this purpose. In all the company operations, as well as document review, complete transparency was observed on behalf of the organization to the auditor.

### **Auditor Qualifications**

The auditor is certified by the State of WA DOE to perform this audit. Kelley Keogh is the Co-Founder/Managing Director of Greeneye Partners, LLC., for whom Emily Farrant works. Their main body of work is in the electronics processing and recycling fields. The State of Washington's DOE maintains the auditor qualifications on file.

### **Findings**

*Metro Metals third party internal auditor, Emily Farrant noted the findings during the December 7<sup>th</sup> and 9<sup>th</sup>, 2021 internal audit at both Vancouver and Tacoma sites:*

#### **SUMMARY OF FINDINGS**

(Findings below apply to the Vancouver sites)

#### **Areas of Concern**

##### **AOC 01**

The facility has not effectively been using their external communication logs. External communication log should be used for all relevant communication, including but not limited to, environmental groups and neighbors, like fire extinguisher checks, scale calibrations and audits.

##### **AOC 02**

6.2-F Objectives and Targets Program, A, 4-10-20 did not match Master List of Documents dated for 6.2-F Objectives and Targets Program, A, 9-1-16.

## **SUMMARY OF FINDINGS**

(Finding below apply to the Tacoma site)

### **Areas of Concern**

#### **AOC 01**

The Data Security Goal is not mapped out with a current program for keeping zero breaches, it is a continued goal from 2019 but the program needs to be updated with a current timeline.

#### **AOC 02**

The facility has not effectively been using their external communication logs. External communication log should be used for all relevant communication, including but not limited to, environmental groups and neighbors, like fire extinguisher checks, scale calibrations and audits.

#### **AOC 03**

6.2-F Objectives and Targets Program, A, 4-10-20 did not match Master List of Documents dated for 6.2-F Objectives and Targets Program, A, 9-1-16.