



LightRecycle Washington 2025 Annual Report

For submission to:

Washington State Department of Ecology
Solid Waste Management Program
Attn: Amanda Romero

Submitted by:

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Submitted May 2026

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1 Executive Summary

The Washington State Mercury-Containing Lights Product Stewardship Program, called LightRecycle Washington (the “Program” or “LRW”), began on January 1, 2015, for the collection and recycling of mercury-containing lights sold at retail.

On September 15, 2025, PCA Product Stewardship Inc. (“PCAPSI”) notified the Washington Department of Ecology (“Ecology”) of its decision to cease administering the LRW program, with program administration concluding on December 31, 2025. While PCAPSI is no longer serving as the program administrator, the stewardship requirements established under Chapter 70A.505 RCW remain in effect. This final annual report has been prepared in accordance with the requirements of Chapter 70A.505 RCW.

During 2025, Washington State residents and businesses could recycle an unlimited number of screw-based compact fluorescent lamps (CFLs), up to 15 pin-based compact or linear fluorescent lamps, and up to two high-intensity discharge (HID) lamps per day, by dropping them off at authorized collection sites throughout the State. These limits reflect amendments to Washington State law that took effect on January 1, 2025. Prior to this change, program participants were limited to recycling up to 10 mercury-containing lights per day.

Collection sites were required to be located in every county and every city of 10,000 or more people. LRW met this requirement through its established collection network of 169 registered sites and by holding collection events in areas where no permanent collection site existed. Collectors included retailers, municipal waste facilities, and residential curbside collection.

Collected mercury-containing lights were transported to the Program processor (recycler) using ground transport, where they were recycled as Universal Waste. Recovered mercury was retorted, then reused or stored, and managed by the processor in compliance with applicable local, state, and federal laws. Recycling mercury-containing lights protects the environment and human health by reducing the release of mercury into the environment and by recovering recyclables, such as metals and glass.

The Program collected 478,213 lbs. of mercury-containing lights in 2025, estimated to represent approximately 951,888 units. Under the 2021 Program Plan Update, submitted on December 23, 2021, and approved by Ecology on January 10, 2022, a full-year collection target for 2025 was not established because the Program was originally scheduled by law to sunset on July 1, 2025. As a result, the approved Plan only established collection targets for the first half of 2025 (Q1 and Q2), totaling 645,614 units. During this period, the Program collected 424,298 units, representing approximately 65.7% of the established target.

The program did not meet its collection target, primarily due to the continued decline in sales of mercury-containing lights over the past several years. The rapid market transition away from mercury-containing lights significantly reduced the volume of available material for collection. As a result, it has become increasingly difficult to achieve the targets established in the 2021 Program Plan Update, and collection volumes are expected to continue declining at a rate greater than originally forecast.

The Program was funded through an Environmental Handling Charge (EHC) added to the purchase price of each mercury-containing light sold at retail in or into Washington State. The current EHC is \$0.95 per unit for all program types. The Program was administered by PCA Product Stewardship Inc. (“PCAPSI”), a 501(c)(3) non-profit organization.

2 Program Description

The Program has been developed pursuant to the provisions of Chapter 70A.505 of the Revised Code of Washington ([Chapter 70A.505 RCW](#)) “Mercury-containing lights-proper disposal” (the “Law”). This Plan complies with the requirements of the “Rule” prescribed in Chapter 173-910 Washington Administrative Code ([Chapter 173-910 WAC](#)) where there is no conflict with the requirements of Chapter 70.275 RCW.

The Law requires that the Program be funded through an EHC added to the purchase price of each mercury-containing light sold at retail in or into Washington State as of the program start date, January 1, 2015. The EHC was \$0.25 per unit for all program product types from the start of the program until June 30, 2017. On July 1, 2017, the EHC was increased to \$0.50 per unit for all program product types. On February 1, 2018, the EHC was increased to \$0.95 per unit for all program types. Each change in EHC was approved by the Department of Ecology.

Every “Producer”, as defined in [RCW 70A.505.020 \(16\)](#), of mercury-containing lights sold in or into Washington State for retail sale must participate in a product stewardship program for those products. Participation in LRW was open to all Producers.

A network of collection sites was established throughout Washington State that includes retailers, municipal waste facilities, and collection events. In 2025, Washington State residents and businesses could recycle an unlimited number of screw-based compact fluorescent lamps (CFLs), up to 15 pin-based compact or linear fluorescent lamps, and up to two high-intensity discharge (HID) lamps per day for free, by dropping them off at authorized collection sites throughout the State and at collection events. These limits reflect amendments to Washington State law that took effect on January 1, 2025. Prior to this change, program participants were limited to recycling up to 10 mercury-containing lights per day.

Collected lights were transported to the Program processor (recycler) using ground transport, where they were recycled as Universal Waste. Recovered mercury was retorted, then reused or stored, and managed by the processor in compliance with applicable local, state, and federal laws.

LRW was administered by PCAPSI, a 501(c)(3) non-profit product stewardship organization incorporated in Oregon and registered in Washington.

Program Exit and Transition

On September 15, 2025, PCA Product Stewardship Inc. (“PCAPSI”) notified Ecology of its decision to cease administering the LightRecycle Washington (“LRW”) program, with program administration concluding on December 31, 2025.

To support an orderly transition, PCAPSI worked with Ecology on transition-related activities.

Ecology has confirmed that while PCAPSI is no longer serving as the program administrator, the stewardship requirements established under Chapter 70A.505 RCW remain in effect. Producers of mercury-containing lights sold in or into Washington State continue to be legally obligated to participate in and fund an approved product stewardship program.

Ecology is currently overseeing transition activities related to future program administration and continuity of collection services within the State. As confirmed with Ecology, participating Producers seeking additional information regarding future program administration or compliance obligations should contact Ecology directly.

3 Participating Producers

PCA Product Stewardship Inc. (“PCAPSI”) was designated as the Stewardship Organization for LRW. PCAPSI administered the Program on behalf of all participating Producers who sold mercury-containing lights in or into Washington State.

The participating Producers in LRW are listed in [Appendix A](#), along with their contact information and the associated brands they sell.

The total number of mercury-containing lights sold at retail in or into the state by participating Producers in 2025, as reported by the participant producers and remitting retailers, is provided in Table 1 below, by product category.

Table 1: Mercury-lights Sold at Retail in WA in 2025

Product Category	2025 Units Sold
Compact Fluorescent Lights (CFL)	149,377
Fluorescent Tubes (All lengths and Shapes)	152,593
High-Intensity Discharge (HID)	5,961
Total	307,931

The total number of mercury-containing lights sold at retail in or into the state by participating Producers in 2025 was 307,931, representing a 5.25% increase from the 2024 sales figure of 292,570.

The increase in reported sales is primarily attributable to the recognition of 13 months of sales in the 2025 financial statements. In accordance with the Program's revenue recognition policy, annual financial statements typically include sales reported for the December to November reporting period. However, due to the cessation of administration of the Program, PCAPSI recognized the December 2025 reporting period in the 2025 financial statements.

4 Program Goals

As outlined in the Program Plan Update dated December 23, 2021, the program used the average of the collected units from 2019 and 2020 (as reported in the 2019 and 2020 LightRecycle Washington Annual Reports respectively), as a baseline to establish collection targets. Table 2 below outlines the collection targets set for 2021-2025.

Table 2: 2021-2025 Collection Targets

Targets	2019-2020 Averaged	2021	2022	2023	2024	Jan-Jun 2025 ¹
Units Collected	1,216,635	1,240,967	1,265,787	1,278,444	1,291,229	645,614
Annual Collection Increase		2%	2%	1%	1%	0%

Due to the cessation of administration of the LRW program, collection activities at registered collection sites ceased on December 31, 2025. As provided in the year-end

¹ Prior to the enactment of Bill HB 1185, the program's original sunset date was July 1, 2025. Therefore, the collection target for 2025 was estimated to be half of the forecasted annual volume, as the program wind-down was expected to start in mid-2025.

letter by the Program processor, the amount of materials collected at registered collection sites and received by the Program processor within the 2025 reporting period was 449,445 lbs. including non-program material ([See Appendix B](#)). This weight includes any non-program materials that may have entered the collection system. This number reflects only the materials physically received by the processor during the 2025 calendar year.

Upon receipt at the processor, each shipment is weighed. Weights are recorded separately for fluorescent tubes and mixed lights, which are comprised of CFLs, HID's and curved fluorescent tubes. Mixed lights are sampled to determine the split of Program materials for those types. Weights of individual lights were used to derive the number of units collected.

Following December 31, 2025, the Program processor conducted final consolidation and transportation of all mercury-containing lights collected on or before December 31, 2025, including materials received through the mail-back program. The final total amount of mercury-containing lights managed in 2025 was estimated at 478,213 lbs., which converts to 951,888 units. This number represents the mercury-containing lights collected at sites and through the mail-back program on or before December 31, 2025, including shipments transported and received by the Program processor in early 2026 as part of final wind-down activities. Based on this, in the first two quarters of 2025, the Program collected a total of 424,298 units, representing 65.7% of the target set for the first half of 2025. A breakdown of the materials collected in 2025 is provided in Table 3 below:

Table 3: Program Materials Managed in 2025

Lights Type	Weight Managed (lbs.)	Weight per Unit (lbs.) ²	Units Managed
Fluorescent Tubes - 4' Straight	292,789	0.5	585,579
Fluorescent Tubes - 8' Straight	94,861	1	94,861
Fluorescent Tubes - Curved Shapes	18,172	0.25	72,687
CFLs (Compact Fluorescent Lights)	45,150	0.25	180,601
HIDs (High Intensity Discharge)	27,240	1.5	18,160
Total ³	478,213		951,888
Collection Rate (units collected/ units sold) ⁴			309.12%

5 Collection System

Collection Sites

Under the requirements of the law, collection services must be provided in all counties in the state and in all cities with populations greater than 10,000, on an ongoing, year-round basis. LRW met this requirement by establishing a collection network of registered sites, that collected all program products. Additionally, LRW held collection events in areas where no permanent collection site could be placed or by advertising the location of nearby collection sites as approved by the Washington State Department of Ecology.

At the end of 2025, LRW had a total of 169 registered collection sites, including:

- 155 sites that accept all program products
- 7 sites that accept CFLs only (including 1 unadvertised site)
- 7 additional sites that are unadvertised, that accept all program products

² Conversion rates used are outlined in the 2021 Program Plan Update, as approved by the Department of Ecology.

³ Total does not add up due to rounding.

⁴ Units collected refer to the final total amount of program mercury-containing lights managed by the processor as of Q1 2026, including materials transported during wind-down activities. Units sold reflect the recognition of 13 months of sales in the 2025 reporting year due to the cessation of administration of the Program.

Only collection sites that are advertised and accept all program products meet the collection site requirements in the law. See [Appendix C](#) for a complete list of advertised collection sites by city and county.

Unadvertised sites include:

- Sites that accumulate lights, but do not collect lights directly from residents or do not want to promote the collection of lights.
- Curbside collectors whose facilities are not suitable for public drop-off of lights for recycling.

Mercury-containing lights were collected at events that were held around the state that were either initiated or supported by the Program. Table 4 below outlines the collection events in 2025:

Table 4: Collection Events in 2025

Location	Events Information	Date
King County, North Bend	North Bend Recycling Event	3-May-25
King County	Wastemobile Events, 20 locations	Multiple days

Following feedback from Ecology on the 2024 LRW Annual Report, a Collection Events Proposal for the following year is required as an appendix to the annual report. However, as the program ceased operations on December 31, 2025, and confirmed by Ecology, a Collection Events Proposal for 2026 is not required and has therefore been excluded from this report.

Curbside Collectors

Two waste haulers that have curbside collection programs for mercury-containing lights are registered as LRW collectors. The waste haulers and location of their corporate headquarters are:

- Recology/CleanScapes, Issaquah, WA
- Clean Earth, Kent, WA

6 Processor

All mercury-containing lights collected under the LRW Program were processed by EcoLights Northwest, LLC (“EcoLights”), an approved downstream processor. The following section provides the processor’s contact information, total volume processed, and a description of the material processing methods.

Name and Contact Information

EcoLights Northwest, LLC (“EcoLights”)
Contact: Alex Domingo
7021 South 220th Street,
Kent, Washington 98032
Phone: 206.388.5330

Total Mercury-containing Lights Processed

As of December 31, 2025, LRW collected 449,445 lbs. of materials as provided in the year-end letter. The final total amount of mercury-containing lights managed in 2025 was estimated at 478,213 lbs., including shipments transported and received by EcoLights in early 2026 as part of final wind-down activities. All materials were processed by EcoLights.

Description of Processing Methods

Fluorescent Tubes: Fluorescent tubes are fed into a machine utilizing a controlled environment where the tubes are mechanically crushed and separated into the following components:

- Glass cullet
- Aluminum end caps
- Mercury phosphor powder

The glass cullet is sent to a Washington aggregate company for use in the manufacture of concrete. The aluminum endcaps are sold in Washington or Oregon as scrap metal, and the mercury phosphor powder is shipped to an EPA regulated and approved mercury retort company in Indiana, where the mercury is removed from the powder and made available for future use in new products or processes such as the manufacture of fluorescent lights. The clean phosphor powder is shipped for recovery of rare earth elements contained in the powder.

CFLs: Compact Fluorescent Lights are fed into a separate processing machine designed to separate the glass from the CFL base, and capture the mercury, in a controlled environment. The glass portion is then fed into a straight tube processing machine,

where the glass is treated in the same way as fluorescent tubes. The bases are sent to a Washington or Oregon recycling company for scrap metal recovery.

HIDs: High-intensity discharge lights are dismantled by hand or by machine. The outer glass envelope is removed, crushed, and sent with other lights glass to an aggregate company for use in concrete. The metal frame is sent to metal recyclers, and the mercury-bearing glass ampules are fed back into the straight tube processing machine for further separation of the glass and mercury. The extracted mercury, along with any mercury-containing phosphor powder, is securely stored in airtight, 55-gallon drums. The securely contained mercury is transported to a certified recycling facility. EcoLights partners with Lighting Resources in Greenwood, IN, a facility permitted to handle and process hazardous materials, including mercury. At Lighting Resources, the mercury undergoes a retorting process. This process involves heating the mercury-containing material in a retort furnace, which vaporizes the mercury. The mercury vapor is then condensed back into its liquid form. This reclaimed mercury is of high purity and can be reused in various applications. The metal base and filament are sent to metal recyclers.

Other: Other types of lights (U-tubes, circular, neon tubes, etc.) are processed in EcoLights straight tube recycling equipment, with components separated in the same manner into commodities to allow for further recycling.

Environmental Health and Safety

EcoLights maintains a certified RIOS: 2016 Environmental Health and Safety Management System and employs a full time Environmental Manager and Health & Safety Manager.

EcoLights' processing equipment is equipped with pleated filters, HEPA filters, and sulfur-impregnated carbon beds to capture dust and mercury vapor before the process air is returned to the processing room. The lights processing room also has additional ventilation equipment designed to capture fugitive mercury, which operates 24 hours per day. The building is not vented to the outside environment.

All technicians working in the lights processing room are equipped with full face respirators designed to capture mercury and protect the employees. They also wear personal protective equipment, including coveralls, steel toed boots, gloves and hairnets to minimize exposure to any fugitive mercury in the processing room. All technicians undergo urine testing at hire to establish a baseline and every 6 months thereafter to ensure safe levels are maintained.

Transportation

Transportation is completed by these two methods:

1. Direct Dispatch – Collection sites contact EcoLights directly and pick-ups are scheduled to be completed by EcoLights or their parent company, Total Reclaim, or a third-party hauler.
2. FedEx and WWEX Group (Worldwide Express) – Box kits are sent out and returned via Fedex and WWEX/UPS.

Compliance Audit Report

EcoLights Northwest provided PCAPSI, in 2025, a Compliance Audit Report completed by a qualified third party, which satisfies the requirements of WAC 173-910-430 (9) (c)

A. See [Appendix E](#).

EcoLights has confirmed that EcoLights has not received any financial penalties, regulatory orders, or violations regarding the processing of lights over the last three years.

7 Education and Outreach

In 2025, the Program continued its efforts to raise awareness about the program. A combination of digital advertising and printed materials helped expand program visibility and direct users to convenient collection sites.

Key outreach initiatives included:

- **Google Search:** A year-long campaign, targeting users actively seeking information on lights recycling and disposal. The campaign generated 3,585 impressions and 474 clicks, with a strong average click-through rate of 13.2%, indicating high intent from users searching for relevant recycling solutions.
- **Meta Ads (Facebook and Instagram):** Social campaigns were used to promote the program and drive traffic to the website and recycling locator. The campaign delivered over 291,000 impressions, 4,405 link clicks, and more than 214,000 video plays, contributing significantly to user engagement and awareness.
- **Website Referrals:** Referral traffic from sources such as kingcounty.gov and ecology.wa.gov remained a key driver of website visits, reinforcing the importance of collaboration in expanding program reach.
- **Printed Materials:** Educational materials were provided at no cost upon request, helping retailers and collection sites educate the public about the program.

Available materials included:

- **Information cards (5" x 8")** for retailers, local governments, and other stakeholders.
- **Collection site posters** to enhance visibility at participating locations.

Examples of marketing materials and advertisements used by the Program in 2025 are provided in [Appendix D](#).

Assessment of Effectiveness

Promotional efforts in 2025 contributed to program visibility and user engagement:

- The LightRecycle Washington website recorded approximately 36,978 sessions, representing a 22.9% increase compared to the previous year.
- The Program reached over 27,000 users, with 99.9% identified as new users, demonstrating continued success in attracting new audiences.
- Users actively engaged with the recycling locator, generating more than 26,000 collection site views, indicating strong intent to access recycling services.
- Organic search (36%) and direct traffic (28%) remained the primary drivers of website visits, while referrals (22%)—particularly from government partners—continued to play a significant role in directing users to the Program.

Overall, the Program’s multi-channel outreach strategy effectively increased awareness, drove high-intent traffic, and supported residents in locating and using recycling services across Washington State.

8 Financial Report

The Program was funded through an EHC added to the purchase price of each mercury-containing light sold at retail in or into Washington State. The EHC was \$0.25 per unit for all program product types from the start of the program until June 30, 2017. Due to declining sales volumes of mercury lights, particularly CFLs, the EHC was increased and approved by Ecology to \$0.50 per unit on July 1, 2017, and further increased to \$0.95 on February 1, 2018.

The financial summary presented below is based on information available at the date of filing of the report. As this is the final year relating to program operations, the provision or allowance for doubtful accounts relating to the collectability of certain accounts receivable has not been finalized. The preliminary financial statements indicate that the Program concluded operations with net assets of \$66,899.

A breakdown of the revenue generated by the Program in 2025, as well as expenses for Program operations, communications, and administration, is provided in Table 5. Program expenses in 2025 include program wind down costs.

Table 5: Program Financial Summary for 2025

Program Revenue	\$316,121
Program Expenses	
Collection	\$82,679
Transportation	237,672
Processing	387,526
Communications	\$2,472
Administration	\$245,263
Government Costs	\$120,540
Total Expenses	\$1,060,799
Surplus/(Deficit)	\$(744,678)
Net Assets, beginning of year	\$811,577
Net Assets, end of year	\$66,899

Appendix A: Participating Producers and Brands

Table 6 lists the Producers who participated in LightRecycle Washington during 2025.

Table 6: List of Participating Producers in 2025

	Company Name	Website	Phone	Address
1	Ace Hardware Corporation	www.acehardware.com	630-990-6600	2200 Kensington Court, Oak Brook, IL 60523
2	Coleman Cable Inc.	www.colemancable.com	800-323-9355	1530 Shields Drive, Waukegan, IL 60085
3	Dolan Northwest LLC	www.seattlelighting.com	503-972-5234	222 2nd Avenue Ext. South, Seattle, WA 98134
4	Elong International USA Inc. (representing Do it Best Corp)	www.elonginternational.com	972-247-7996	2425 Mclver Lane #150, Carrollton, TX 75006
5	General Electric Lighting	www.gelighting.com	216-266-9729	1975 Noble Rd, East Cleveland, OH 44112
6	Good Earth Lighting Inc.	www.goodearthlighting.com	800-291-8838	1400 East Business Center Drive, Ste. 108, Mount Prospect, IL 60056
7	LEDVANCE Corp	www.ledvance.com	978-570-3000	200 Ballardvale Street, Wilmington, MA 01887
8	Orgill, Inc.	www.orgill.com	901-754-8850	4100 S Houston Levee Rd., Collierville, TN 38017
9	OttLite Technologies, Inc	www.ottlite.com	800-842-8848	220 W 7th Ave, Suite 100, Tampa FL 33602
10	Philips Lighting North America Corporation	www.usa.philips.com	202 962 8567	200 Franklin Square, Somerset, NJ 08873
11	Satco Products, Inc.	www.satco.com	631-243-2022	110 Heartland Blvd., Brentwood, NY 11717
12	Ushio America, Inc.	www.ushio.com	714-236-8600	5440 Cerritos Avenue, Cypress, CA 90630

	Company Name	Website	Phone	Address
13	Venture Lighting International, Inc.	www.venturelighting.com	800-451-2606	32000 Aurora Road - Suite A, Solon, Ohio 44139
14	Villa Lighting Supply, Inc.	www.villalighting.com	314-531-2600	2929 Chouteau Ave, Saint Louis, MO 63103

The following brands were sold by participating Producers who participated in LightRecycle Washington during 2025:

ATR	Southwire Company
Candela	Sylvania
CBC	TCP
Cooper Lighting	Westinghouse
Fulham	Westpointe
GE	Ace
GE Lighting	Advance
Green Creative	Bulbrite
Hygrade	Good Earth Lighting
Keystone	LEDVance LLC
LEDVance LTD	Ottlite
Maxlite	Philips
Norman	Southwire
Satco	Ushio
Venture Lighting	

Appendix B: Collection and Processing Verification

The following letter from EcoLights confirms the amount of materials collected and processed by LightRecycle Washington during 2025.



7021 South 220th Street
Kent, WA 98032
T 206.343.7443
F 206.343.7445
ECOLIGHTS.COM

April 8, 2026

LightRecycle Washington Program
PCA Product Stewardship Inc.

RE: 2025 Processing Volume

Dear LightRecycle Washington:

This letter is to acknowledge that Ecolights Northwest, LLC picked up or received and recycled the following volume of used fluorescent lamps and other materials from collection sites under the LightRecycleWashington program during 2025:

- Total program material weight: 449,445 pounds

This volume includes some non-program materials, such as incandescent lamps in program containers. Additional back-up documentation of these volumes is available upon request.

Thank you again for the opportunity to work with you on this program. We look forward to continuing to provide comprehensive lamp recycling services to PCA Product Stewardship Inc. and the residents and small businesses of Washington during the coming year.

If you have any questions, please contact me at 206-343-7443.

Sincerely,

A handwritten signature in black ink, appearing to read "Bobby Farris".

Bobby Farris
CEO
EcoLights Northwest, LLC

Appendix C: Registered Collection Sites

The following Table 7 and Table 8 list the registered LightRecycle Washington collection sites with coordinates who participated in the Program during 2025. Note, unadvertised sites have not been listed, to maintain confidentiality for those sites who wish to remain unadvertised.

Table 7: Registered Collection Sites who accept all Program Products:

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
1	Ace Hardware	4816 Pt. Fosdick Dr. NW	Gig Harbor	WA	98335	Pierce	47.3018	-122.579315	3061
2	Ace Hardware and Sporting Goods on Keene Road	103 Keene Road	Richland	WA	99352	Benton	46.228695	-119.269646	1457
3	Ace Hardware of Anacortes	1720 "Q" Avenue	Anacortes	WA	98221	Skagit	48.508755	-122.634483	1829
4	Ace Hardware of Evergreen Way	4835 Evergreen Way	Everett	WA	98203	Snohomish	47.953232	-122.211929	469
5	Ace Hardware of Friday Harbor	340 Argyle Avenue	Friday Harbor	WA	98250	San Juan	48.533226	-123.016998	2809
6	Airport Road Recycling & Transfer Station	10700 Minuteman Dr.	Everett	WA	98204	Snohomish	47.899292	-122.267838	0

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
7	Around Again	22 Gilbert Rd.	Sequim	WA	98382	Clallam	48.07753	-123.156166	2496
8	Asotin County Regional Landfill	2901 6th Avenue	Clarkston	WA	99403	Asotin	46.38504	-117.113449	1112
9	Batteries Plus Bulbs	14917 NE 20th St.	Bellevue	WA	98007	King	47.62785	-122.141716	2239
10	Batteries Plus Bulbs	31830 Pacific Hwy S	Federal Way	WA	98003	Pierce	47.316484	-122.312664	1492
11	Batteries Plus Bulbs	321 North Columbia Center Blvd.	Kennewick	WA	99336	Benton	46.211887	-119.226311	1384
12	Batteries Plus Bulbs	2905 Capital Mall Dr. SW	Olympia	WA	98502	Thurston	47.039639	-122.937943	746
13	Batteries Plus Bulbs	10210 123rd St. Ct. E	Puyallup	WA	98374	Pierce	47.143986	-122.292564	497
14	Batteries Plus Bulbs	536 NE Northgate Way	Seattle	WA	98125	King	47.70887	-122.321663	10447
15	Batteries Plus Bulbs	7704 North Division Suite C	Spokane	WA	99208	Spokane	47.727936	-117.410828	3295
16	Batteries Plus Bulbs	11101 East Sprague	Spokane	WA	99206	Spokane	47.657516	-117.255898	2263
17	Batteries Plus Bulbs	4027 Tacoma Mall Blvd.	Tacoma	WA	98409	Pierce	47.221512	-122.46608	2985

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
18	Batteries Plus Bulbs	17065 Southcenter Parkway	Tukwila	WA	98188	King	47.450226	-122.263359	271
19	Batteries Plus Bulbs	632 South 9th Ave.	Walla Walla	WA	99362	Walla Walla	46.056477	-118.347443	2013
20	Batteries Plus Bulbs	1731 S 1st St	Yakima	WA	98901	Yakima	46.57867	-120.4919	1544
21	Bayview Solid Waste Dropbox and Recycle Park	5790 S. Kramer Road	Langley	WA	98260	Island	48.000809	-122.4561	0
22	Bow Lake Recycling and Transfer Station	18800 Orillia Road S	Tukwila	WA	98188	King	47.431992	-122.269585	10630
23	Bredfield's True Value Hardware	102 Cowlitz St West	Castle Rock	WA	98611	Cowlitz	46.275555	-122.909035	946
24	Bruce Transfer Station	504 South Lucy Road	Othello	WA	99344	Adams	46.797951	-119.135475	0
25	BZ Corners Transfer Station	5 Firtee Rd	Husum	WA	98623	Klickitat	45.861584	-121.510588	0
26	Camano Island Transfer Station	75 E. Camano Hill Road	Camano Island	WA	98282	Island	48.206268	-122.480812	0
27	Central Transfer and Recycling	11034 NE 117th Avenue	Vancouver	WA	98662	Clark	45.70192	-122.555199	19753

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
28	Chelan County Moderate Risk Waste Facility	3612 Highway 97A	Wenatchee	WA	98801	Chelan	47.48358	-120.32066	1341
29	City of Bridgeport	1007 Fairview Ave.	Bridgeport	WA	98813	Douglas	48.011707	-119.675583	0
30	City of Covington	16720 SE 271st St	Covington	WA	98042	King	47.35928	-122.11833	157
31	City of Lynden	300 4th St	Lynden	WA	98264	Whatcom	48.946152	-122.448738	300
32	City of Monroe	City Hall at City of Monroe	Monroe	WA	98272	Snohomish	39.85136	-104.946136	62
33	City of Sammamish	801 228th Ave SE	Sammamish	WA	98075	King	47.58806	-122.01811	72
34	City of SeaTac	4800 South 188th St.	SeaTac	WA	98188	King	47.43382	-122.27268	351
35	City of Sunnyside	818 East Edison	Sunnyside	WA	98944	Yakima	46.324148	-120.00903	0
36	City Recycling Center	315 Sterling Street	Sedro-Woolley	WA	98284	Skagit	48.496758	-122.236221	0
37	Colville Henery Hardware	984 S. Main St.	Colville	WA	99114	Stevens	48.536324	-117.905891	1801
38	Coupeville Solid Waste Complex	20018 State Highway 20	Coupeville	WA	98239	Island	48.207771	-122.644577	8617

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
39	Crown Hill Tweedy and Popp Hardware	9000 Holman Rd. NW	Seattle	WA	98117	King	47.694467	-122.374539	1490
40	CT Recycling	6739 Roche Harbor Road	Friday Harbor	WA	98250	San Juan	48.595257	-123.111656	0
41	Dallesport Transfer Station	126 Tidyman Rd	Dallesport	WA	98617	Klickitat	45.625631	-121.177782	0
42	Darrington Hardware & Supply	1220 SR 530 NE	Darrington	WA	98241	Snohomish	48.257141	-121.611641	302
43	Deer Park Ace Hardware	141 West H Street	Deer Park	WA	99006	Spokane	47.946606	-117.480293	161
44	Dubuque Road Neighborhood Recycling & Disposal Center	19619 Dubuque Road	Snohomish	WA	98290	Snohomish	47.96307	-121.967209	0
45	Edmonds Public Works (Front Office)	7110 210th St SW	Edmonds	WA	98026	Snohomish	47.80763	-122.32939	199
46	Ekrem Hardware Do-It Center	237 E. Fairhaven Ave.	Burlington	WA	98233	Skagit	48.475773	-122.332588	752
47	Ellisforde Transfer Station	65 Swanson Mill Rd.	Oroville	WA	98844	Okanogan	48.844475	-119.390854	0

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
48	Enumclaw Recycling and Transfer Station	1650 Battersby Ave E	Enumclaw	WA	98022	King	47.206444	-121.955521	4256
49	Factoria Household Hazardous Waste Drop Off Site	13800 SE 32nd St.	Bellevue	WA	98005	King	47.582642	-122.1586	19161
50	Fairwood Ace Hardware	14100 SE Petrovitsky Road	Renton	WA	98058	King	47.446106	-122.150764	1448
51	Ferndale Ace Hardware	5715 4th Ave.	Ferndale	WA	98248	Whatcom	48.849239	-122.594383	790
52	Ferry County Public Works - Solid Waste Div.	584 Torboy Dump Road	Republic	WA	99166	Ferry	48.648216	-118.737808	0
53	Garfield County Public Works	19th and Arlington	Pomeroy	WA	99347	Garfield	46.474873	-117.602692	468
54	Goldendale Transfer Station	1205 W Broadway St.	Goldendale	WA	98920	Klickitat	45.824419	-120.84248	0
55	Goodwill - West Richland	4034 W Van Giesen St. Suite B	West Richland	WA	99352	Benton	46.298166	-119.340317	0

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
56	Granite Falls Neighborhood Recycling & Disposal Center	7526 Menzel Lake Road	Granite Falls	WA	98252	Snohomish	48.063477	-121.934578	0
57	Grant County Solid Waste	3803 Neva Lake Road NW	Ephrata	WA	98823	Grant	47.26664	-119.55932	863
58	Grigg's Department Store Ace Hardware	801 W Columbia St	Pasco	WA	99301	Franklin	46.290855	-119.275673	54
59	Grigg's Department Store Ace Hardware	1415 George Washington Way	Richland	WA	99354	Benton	46.228477	-119.098381	2001
60	Hero Ace Hardware	1915 4th Ave	Seattle	WA	98101	King	47.612576	-122.339233	286
61	Hi-School Ace Hardware	1605 W. Main Street	Battle Ground	WA	98604	Clark	45.69066	-122.65796	1032
62	Hi-School Ace Hardware	13009 NE Hwy. 99	Vancouver	WA	98686	Clark	45.780594	-122.554794	401
63	Household Hazardous Waste Collection Facility	5551 SW Imperial Way	Bremerton	WA	98312	Kitsap	47.502579	-122.768547	11916

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
64	Household Hazardous Waste Drop-off Station	3434 McDougall Ave.	Everett	WA	98201	Snohomish	47.971756	-122.200249	52474
65	Island Home Center & Lumber	17633 97th Pl SW	Vashon	WA	98070	King	47.447418	-122.458183	0
66	JBLM DPW Environmental Operations	Bldg 9679, Rainier Drive	Joint Base LewisMcChord	WA	98433	Pierce	47.083027	-122.561376	5661
67	Jefferson County Disposal Site Quilcene	295312 Highway 101	Quilcene	WA	98376	Jefferson	47.821266	-122.886192	0
68	Jefferson County Recycle Center	325 County Landfill Road	Port Townsend	WA	98368	Jefferson	48.103676	-122.828171	7277
69	Johnsons Home and Garden	26625 Maple Valley Black Diamond Rd.	Maple Valley	WA	98038	King	47.362782	-122.021156	3965
70	Junction True Value Hardware	4747 44th Ave S.W.	Seattle	WA	98116	King	47.559647	-122.388573	1077
71	Kenmore City Hall	18120 68th Ave NE	Kenmore	WA	98028	King	47.76048	-122.24937	175

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
72	Kennewick Ace Hardware and Sporting Goods - Griggs	2831 W Kennewick Ave.	Kennewick	WA	99336	Benton	46.208462	-119.160934	1375
73	Kittitas Solid Waste	925 Industrial Way	Ellensburg	WA	98926	Kittitas	46.983341	-120.54995	3356
74	Lake Chelan Lighting Center	917 E Woodin Ave	Chelan	WA	98816	Chelan	47.839859	-120.003136	1782
75	Lake City Tweedy & Popp Hardware	3040 NE 127th St.	Seattle	WA	98125	King	47.721107	-122.295448	830
76	Lakewood Ace Hardware	8123 Steilacoom Blvd. SW	Lakewood	WA	98498	Pierce	47.180809	-122.54583	882
77	Lee Frank Mercantile	324 S. Whitcomb ave.	Tonasket	WA	98855	Okanogan	48.704945	-119.440018	102
78	LeMay's Central Transfer Station	4201 Olympic Highway	Aberdeen	WA	98520	Grays Harbor	46.978497	-123.74971	3381
79	Lewis County Solid Waste	1411 So Tower Ave.	Centralia	WA	98531	Lewis	46.699848	-122.962875	6286
80	Lincoln Creek Lumber/Ace Hardware	2421 93rd Ave SW	Tumwater	WA	98512	Thurston	46.9519	-122.933289	600

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
81	Lopez Solid Waste	2449 Fisherman Bay Road	Lopez Island	WA	98261	San Juan	48.518173	-122.90992	629
82	LRI PRarie Ridge	11710 Prarie Ridge Dr E	Bonney Lake	WA	98391	Pierce	47.135872	-122.138204	160
83	Madison Park Hardware	1837 42nd Avenue East	Seattle	WA	98112	King	47.635704	-122.27882	397
84	Maple Leaf Ace Hardware	9000 Roosevelt Way NE	Seattle	WA	98115	King	47.69437	-122.317123	3719
85	Marty's True Value Hardware	205 E First Street	Mattawa	WA	99349	Grant	46.736897	-119.905022	0
86	Mason County Landfill	501 Eells Hill Rd	Shelton	WA	98584	Mason	47.25229	-123.188118	3792
87	McLendon Hardware	23662 104th Ave. SE	Kent	WA	98031	King	47.389294	-122.202179	2446
88	McLendon Hardware	11307 Canyon Rd. E	Puyallup	WA	98373	Pierce	47.477882	-122.213936	2329
89	McLendon Hardware	440 Rainier Ave. S	Renton	WA	98057	King	47.755955	-122.16713	1703
90	McLendon Hardware	1111 Fryer Ave.	Sumner	WA	98390	Pierce	47.153568	-122.355888	2896
91	McLendon Hardware	1015 N. Pearl Street	Tacoma	WA	98406	Pierce	47.204391	-122.242287	3151

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
92	McLendon Hardware	17705 130th Ave. NE	Woodinville	WA	98072	King	47.259171	-122.514114	2971
93	Mercer Island Community and Event Center	9611 SE 36 St	Mercer Island	WA	98040	King	47.59003	-122.22742	2751
94	Mercer Island True Value Hardware	7707 SE 27th St. Suite 110	Mercer Island	WA	98040	King	47.586113	-122.234474	279
95	Methow Recycles	12 Twisp Airport Road	Okanogan	WA	98856	Okanogan	48.355515	-120.101402	371
96	Montgomery Hardware	9110 E Montgomery Ave	Spokane Valley	WA	99206	Spokane	47.678291	-117.281693	2570
97	Mt. Pleasant Transfer Facility	1111 MT. Pleasant Rd.	Washougal	WA	98671	Clark	45.589603	-122.196953	0
98	Newcastle City Hall	12835 Newcastle Way, Suite 200	Newcastle	WA	98056	King	47.5387	-122.16874	97
99	North County Recycling & Transfer Station	19600 63rd Ave. NE	Arlington	WA	98223	Snohomish	48.17482	-122.147491	0
100	North County Transfer Station	22123 N. Elk-Chattaroy Road	Colbert	WA	99005	Spokane	47.858654	-117.354973	5649

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
101	North Seattle Household Hazardous Waste Collection Facility	12550 Stone Avenue North	Seattle	WA	98133	King	47.720615	-122.342094	11132
102	North Whidbey Solid Waste Dropbox and Recycle Park	3151 Oak Harbor Road	Oak Harbor	WA	98277	Island	48.295639	-122.657738	0
103	Northshore Ace Hardware	35419 21ST Ave. S.W.	Federal Way	WA	98023	King	47.283989	-122.361145	819
104	Okanogan County Central Landfill	241 North B&O Rd.	Okanogan	WA	98840	Okanogan	48.361263	-119.583389	833
105	Olympia Ace Hardware	400 Cooper Point Road	Olympia	WA	98502	Thurston	47.045521	-122.94088	557
106	Othello Ace Hardware	420 E Main Street	Othello	WA	99344	Adams	46.826168	-119.16925	218
107	Pacific Building Center - True Value Hardware	2677 Bell Road	Blaine	WA	98230	Whatcom	48.974003	-122.72979	666
108	Pacific Supply	1417 12th	Seattle	WA	98122	King	47.613533	-122.317322	579
109	Patnode's True Value	600 9th St.	Benton City	WA	99320	Benton	46.264038	-119.487312	376

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
110	Pullman Disposal Service	135 NW Harold Dr.	Pullman	WA	99163	Whitman	46.732046	-117.194863	359
111	Recolgy CleanScapes	317 NW Gilman Road #22	Issaquah	WA	98027	King	47.74027	-122.34573	1834
112	Recolgy CleanScapes	15235 Aurora Ave N. #102	Shorline	WA	98133	King	47.539921	-122.04142	0
113	Recology CleanScapes Burien Retail Store	16200 1st. S.	Burien	WA	98166	King	47.458298	-122.333923	2490
114	Recology CleanScapes Retail Store	22833 Bothell-Everett Hwy, #111	Bothell	WA	98021	King	47.790769	-122.215841	1808
115	Riders True Value	117 E Winew Country Rd.	Grandview	WA	98930	Benton	46.25624	-119.901061	300
116	Ritzville Transfer Station	1803 East Danekas Road	Ritzville	WA	99169	Adams	47.11932	-118.386050	0
117	Rock Island Community Recycling Center	23 S Garden Ave.	Rock Island	WA	98850	Douglas	47.37344	-120.1437	0
118	Seattle Lighting	1882 136th Pl. NE	Bellevue	WA	98005	King	47.59987	-122.32987	2526
119	Seattle Lighting	1811 Hewitt Avenue	Everett	WA	98201	Snohomish	47.62772	-122.157101	0

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
120	Seattle Lighting	222 Second Ave	Seattle	WA	98104	King	47.195767	-122.463137	1142
121	Seattle Lighting	6710 Tacoma Mall Blvd.	Tacoma	WA	98409	Pierce	47.979332	-122.205011	353
122	Seattle Lighting - Clearance Outlet	26 S. Hanford St.	Seattle	WA	98134	King	47.575645	-122.338772	0
123	Sety's Ace Hardware	301 E. Main	Chewelah	WA	99109	Stevens	48.276604	-117.713142	90
124	Shoreline Recycling and Transfer Station	2300 N 165th Street	Shoreline	WA	98133	King	47.74855	-122.332298	8984
125	Skagit County Household Hazardous Waste Facility	14104 Ovenell Rd	Mount Vernon	WA	98273	Skagit	48.45652	-122.441503	9073
126	South Hill Ace Hardware	4416 S. Regal St.	Spokane	WA	99223	Spokane	47.612621	-117.369453	106
127	South Seattle Household Hazardous Waste Collection Facility	8100 2nd Avenue South	Seattle	WA	98108	King	47.530411	-122.330223	8939

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
128	Southwest Recycling & Transfer Station	21311 61st Place West	Mountlake Terrace	WA	98043	Snohomish	47.80444	-122.315048	0
129	Spokane Valley Ace Hardware	15405 E. Sprauge Ave	Spokane Valley	WA	99037	Spokane	47.657486	-117.198021	427
130	Stans Merry Mart	310 North Pearl Street	Ellensburg	WA	98926	Kittitas	46.99501	-120.54686	209
131	Stan's Merry Mart	733 S. Wenatchee Ave.	Wenatchee	WA	98801	Chelan	47.4154	-120.30298	3412
132	Stevenson Transfer Facility	1332 Ryan Allen Rd.	Stevenson	WA	98648	Skamania	45.690994	-121.902931	1205
133	Stoneway Hardware Ballard	4910 15th Ave NW	Seattle	WA	98107	King	47.664825	-122.375511	1014
134	Sudbury Regional Landfill, City of Walla Walla	414 Landfill Rd.	Walla Walla	WA	99362	Walla Walla	46.072445	-118.412537	1853
135	Sultan Neighborhood Recycling & Disposal Center	33014 Cascade View Drive	Sultan	WA	98294	Snohomish	47.864994	-121.789085	0
136	Sunshine Disposal and Recycling	2405 N. University Rd.	Spokane Valley	WA	99206	Spokane	47.67915	-117.262199	3883

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
137	Swain's General Store	602 E 1st St	Port Angeles	WA	98362	Kitsap	48.114712	-123.423889	1754
138	The Exchange/Orcas Recycling Services	3398 Orcas Road	Eastsound	WA	98245	San Juan	48.66592	-122.926567	1440
139	Thurman Supply	1807 East Front Street	Port Angeles	WA	98362	Kitsap	48.108273	-123.402573	2406
140	Thurston County Hazohouse	2420 Hogum Bay Rd NE	Lacey	WA	98516	Thurston	47.066704	-122.761894	13050
141	Total Reclaim	7021 S 220th St	Kent	WA	98032	King	47.583301	-122.325279	0
142	Town of Waterville Community Recycling Center	720 N. Chelan Ave.	Waterville	WA	98858	Douglas	47.650669	-120.071426	217
143	Underwood Transfer Facility	1402 Little Buck Creek Rd.	Underwood	WA	98650	Skamania	45.779709	-121.538147	0
144	Valley Transfer Station	3941 North Sullivan Road	Spokane Valley	WA	99216	Spokane	47.690617	-117.196869	7523
145	Vashon Recycling and Transfer Station	18900 Westside Hwy SW	Vashon	WA	98070	King	47.435272	-122.500099	1529

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
146	Wallingford Tweedy & Popp Hardware	1815 N 45th St. Ste. 112	Seattle	WA	98103	King	47.660629	-122.335701	0
147	Wandermere Ace Hardware	12908 N. Hwy. 395	Spokane	WA	99218	Spokane	47.77452	-117.401116	268
148	Washougal Transfer Station	4020 S Grant Street	Washougal	WA	98671	Clark	45.562439	-122.327972	4823
149	West Van Materials Recovery Center	6601 NW Old Lower River Road	Vancouver	WA	98660	Clark	45.653385	-122.736732	9133
150	Westlake Ace Hardware	146 5th St	Raymond	WA	98577	Pacific	46.68444	-123.73143	0
151	WFC Blaine Ace Hardware	1733 H Street Suite 700	Blaine	WA	98230	Whatcom	48.992352	-122.730309	0
152	Whatcom County Disposal of Toxics Facility	3505 Airport Drive	Bellingham	WA	98226	Whatcom	48.783775	-122.52771	12434
153	Whitman County Public Works Solid Waste Facility	252 Landfill Road	Pullman	WA	99163	Whitman	46.764233	-117.280174	1184
154	Woodland Ace Hardware	1325 Lewis River Rd	Woodland	WA	98674	Cowlitz	45.909073	-122.741051	650

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long	Total Collected (lbs.)
155	Zacher Processing Center	6114 Batterman Road	East Wenatchee	WA	98802	Douglas	47.395028	-120.144215	494

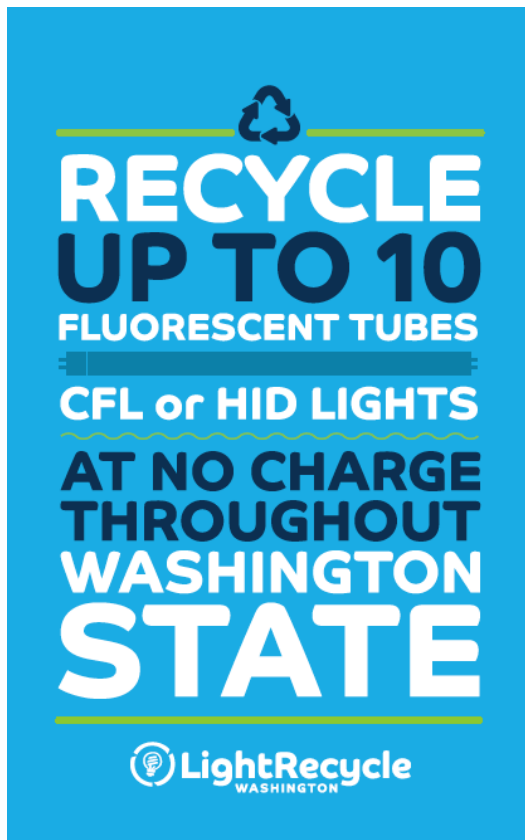
Table 8: Registered Collection Sites with coordinates that accept CFLs only (excluding the unadvertised site):

	Collection Site Name	Street	City	State	ZIP Code	County	Lat	Long
1	Clark Public Utilities - Electric Center	1200 Fort Vancouver Way	Vancouver	WA	98663	Clark	45.6302	-122.663261
2	Clark Public Utilities - Operations Office	8600 NE 117 Ave.	Vancouver	WA	98662	Clark	45.6845	-122.553902
3	Kirkland City Hall	123 5th Ave	Kirkland	WA	98033	King	47.6783	-122.207108
4	Orcas Power and Light Cooperative	183 Mt. Baker Rd.	Eastsound	WA	98245	San Juan	48.7011	-122.888557
5	Orcas Power and Light Cooperative	1034 Guard St.	Friday Harbor	WA	98250	San Juan	48.539	-123.032272
6	Bellingham Ace Hardware	356 36th St.	Bellingham	WA	98225	Whatcom	48.7312	-122.47065

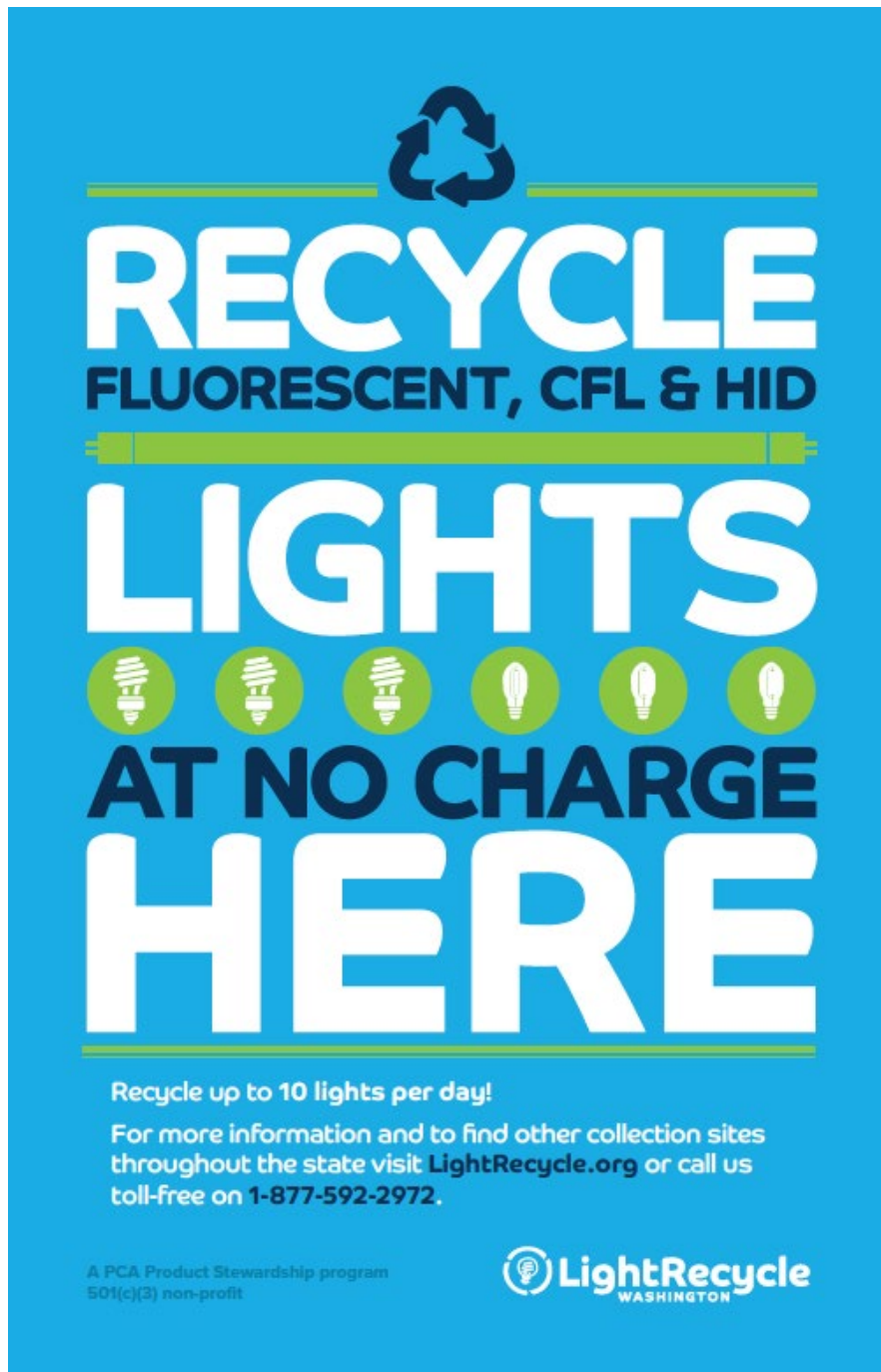
Appendix D: Education and Outreach Materials

The following images are examples of the education and outreach materials used by LightRecycle Washington in 2025.

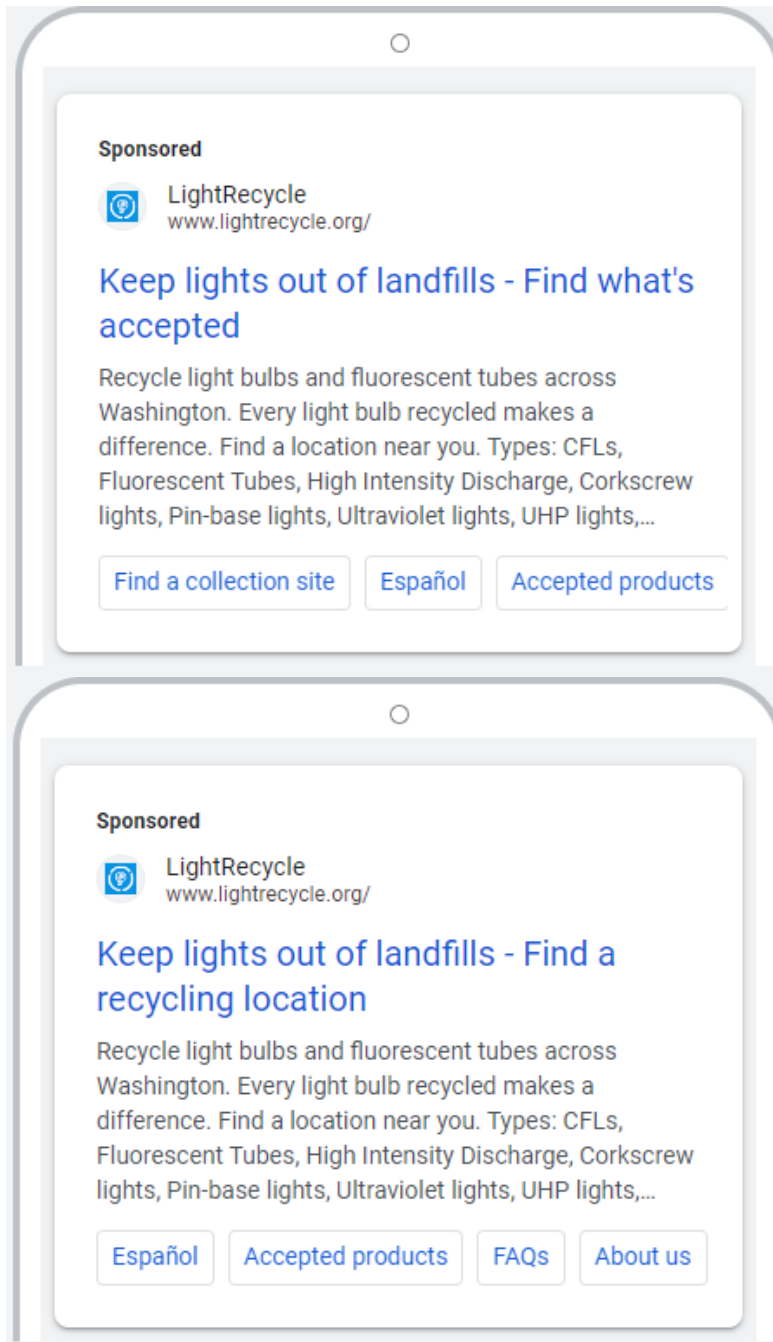
Information Card, 5" x 8"



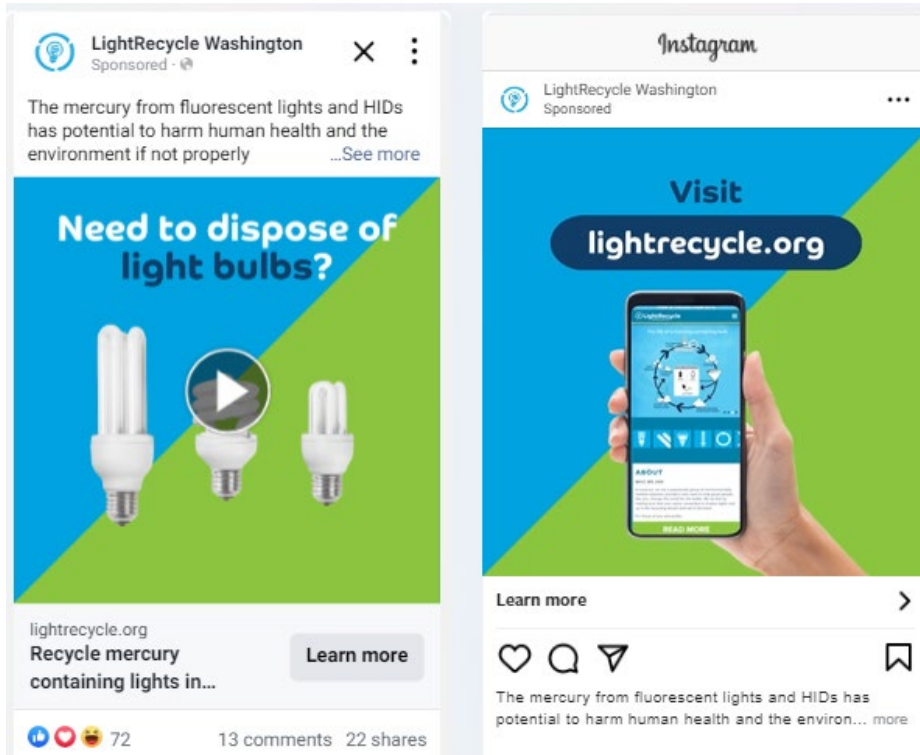
Collection Site Posters, 11" x 17"



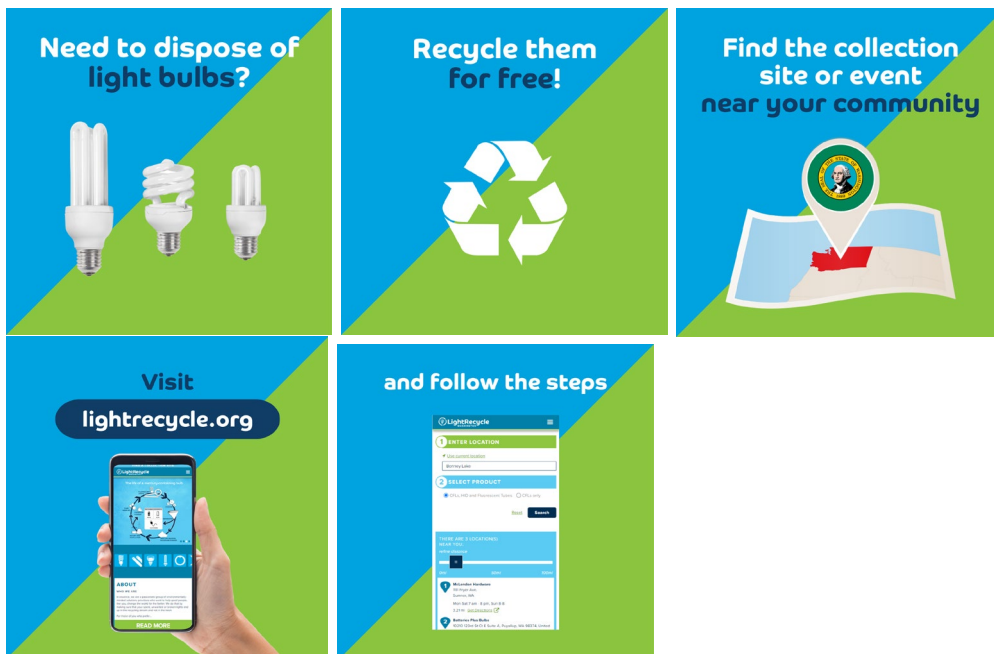
Digital Advertising
Google Search – Program Awareness



Meta ads



Video sequence for Meta ads:



Appendix E: Processor Compliance Audit

The following is the 2025 compliance audit report of the Programs processor Ecolights Northwest, LLC conducted by Stephen Lefon, on July 16-18, 2025.

	Auditing Document	
	AD-17 R2v3 RIOS WA State Recycling Program Internal Audit Form	
	Revision Date: 05/29/2025	Revision #: 1.0

Scope/Site Information

Customer Name:	Total Reclaim
Customer Contact:	Arnold
Address:	7021 S 220 th Street Kent, WA 98032; 1915 S Corgiat Dr Seattle WA 98108
Audit Standard(s):	R2v3(TRI only), RIOS (Eco Lights and TRI), WAC 173-900-650(TRI only).
Audit Date(s):	July 16-18 2025
Employee Count:	35
Number of Shifts:	1
Auditor:	Stephen Lefon

Overview

The purpose of the audit was to verify that the management system as described in the management system procedures conforms to the requirements of the QEH&S Management System and Standards listed above have been implemented as planned. In addition, legal requirements were also assessed to verify that the facility is meeting applicable laws. This audit was conducted using sampling methods and other standard audit procedures. As such, while every effort has been made to ensure accuracy and reliability, the audit does not provide absolute assurance that all instances of non-compliance, errors, or irregularities were identified. There remains a possibility that some items may not have been detected.

If the procedure or standard requirements are not followed, non-conformances are raised. The Internal Audit is an integral part of the Plan – Do – Check – Adjust cycle of continual improvement. The audit activities included the interview of various company personnel, observations of activities related to the management system, and the review of documents and records.

Areas Audited

Processes Audited:	☒ Shipping Receiving ☒ Data Destruction/Security ☒ Throughput ☒ Refurbishment ☒ Resale	☒ Triage ☒ Admin ☒ De-manufacturing ☒ Transportation ☒ Vendor Qualifications	Appendix Audited:	☒ A - Downstream Chain ☒ B - Data Destruction ☒ C – Test and Repair ☐ D – Specialty Electronics ☒ E – Materials Recovery ☐ F – Brokering ☐ G – Solar Panels
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	Auditing Document	
	AD-17 R2v3 RIOS WA State Recycling Program Internal Audit Form	
	Revision Date: 05/29/2025	Revision #: 1.0

Audit Findings

Nonconformance Found:	2
Opportunities for Improvement found:	0

Non-Conformances/Opportunities for Improvement Found

NCR#/Area Reviewed	NC #1 Tracking Throughput
Requirement	R2v3 Core 5 b2 Maintain total inventory levels below the defined limits in conformance with the R2 Facility's legal requirements, closure plan, and financial assurance.
Evidence:	Inventory level for CRTs found over closure limit listed of 12,000lbs; 13,000 found in razor system.

NCR#/Area Reviewed	NC #2 Categorization
Requirement	R2v3 Core 6 b1 All equipment, components, and materials controlled by the R2 Facility shall be identified with its corresponding R2 equipment categories from the REC3, or equivalent correlated internal categories.
Evidence:	Material in transition (deman and sorting) gaylords found not labeled/categorized until the boxes are filled and weighed.

	Auditing Document	
	AD-17 R2v3 RIOS WA State Recycling Program Internal Audit Form	
	Revision Date: 05/29/2025	Revision #: 1.0

Section	Responsible Recycling Practices (R2v3)/Washinton State Electronics Recycling Program	Audited	Summary/Evidence Reviewed
Core Requirement 1 Scope			
1a	Scope Includes all activities and Core Processing Requirements performed.	☒	Scope listed in manual meets performed observed.
1b	R2 Certificate includes all Process Requirements, allowances, All Legal names.	☒	NA
1c	Site maintains and communicates publicly list of additional locations operated by; that are not R2 Certified.	☒	Website lists additional sites owned by TRI.
1d	Facility is not listed on SERI website for deceptive Marketing.	☒	Found in compliance.
Core Requirement 2 Reuse, Recovery Hierarchy			
2a	R2 Management Policy	☒	5.2.-P R2 policy in place
2b WSEP Sec 5(a) (i)	Facility evaluates for equipment according to Core Requirement 6: Reuse, Recovery, Disposal; Including Non-FM's.	☒	Policy included R2 hierarchy.
WSEP Sec 1	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.	☒	Management strategies are reviewed at minimally at MRs to evaluate strategies.
Core Requirement 3 EH&S Management System			
3a WSEP Sec 3(a)&(b)	R2 Facility is certified to RIOS, ISO standards. Processor must develop, document, fully implement, and update at least annually a written EHSMS that includes all of the following: Written goals and utilization of a "plan, do, check, act" model that identifies environmental aspects, implements operational controls, and provides corrective action procedures. Processor must ensure employees understand and follow protocols of EHS MS. Identify and Evaluation EHS aspects and impacts of processor as well as downstream vendors.	☒	TRI and ECO are certified to RIOS. Vendor has list of hazards, aspects and controls in place. Employees found knowledgeable of hazards and controls.
3b	R2 Facility shall integrate management systems and are internally audited annually.	☒	MS are integrated and scheduled to be audited annually.

	Auditing Document	
	AD-17 R2v3 RIOS WA State Recycling Program Internal Audit Form	
	Revision Date: 05/29/2025	Revision #: 1.0

Section	Responsible Recycling Practices (R2v3)/Washinton State Electronics Recycling Program	Audited	Summary/Evidence Reviewed
3c WSEP Sec 4(a)(b)(c)	Conformance Records are kept for 3 years. 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 for at least three years. Including brokering records if applicable.	☒	Records found in compliance and kept for 3 years. Current records are kept in Razor MTS and older records kept in paper/bols...
3d1 WSEP Sec 5(a)(ii)	Has knowledge and technical capability to process material it accepts.	☒	Found to have capability to process electronics and lamps.
3d2 WSEP Sec 3(a)&(b)	Periodically reviews EH&S risk and hazards through entire recycling chain.	☒	Risk is documented and reviewed annually; last EHS review date is 07/31/2024; Industrial Hygiene study completed June 25 2025.
3d3	Periodically reviews risk to exposure of hazardous substances and materials (sampling)	☒	IH study conducted in 2025. Findings: No exposure in TRI, Eco mercury exposure, continue use of respirators and additional cleaning daily.
3d4	Visually inspect equipment received/handled for hazardous conditions.	☒	Equipment is inspected a receiving; products recall list is maintained.
3d5 WSEP Sec 5(a)(iii)	Adhere to Good Housekeeping Standards that are planned, implemented and monitored.	☒	Housekeeping is done the last 30 minutes a day and vacuum sweeper is used daily to capture dust.
3d6,7	Provide sanitary facilities for worker and prevent food or drink in areas with contaminants.	☒	Yes, signs in place to prevent food and drink and operatable restrooms found in place.
3d8	Provide the same care for workers and contractors	☒	Yes, documented HS procedure.
3d9 WSEP Sec 5 (d)(vi)	Designate a Qualified employee to promote EH&S protections. Shall be identified to all employees and 2-way communication and be proactively address potential hazards	☒	Arnold is designated EHS employee and works on-site and available through email/phone.

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WSEP Sec 5 (c)	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.	☒	Emergency preparedness and response plan in place as well as facility contingency plan to address spills/fires...No spills.
WSEP Sec5(a)(v)	Processor must use a certified scale to weigh CEPs and components counted towards a plan's equivalent share.	☒	Scales are certified from Cheyenne in 2025.
Core Requirement 4 Legal and Other Requirements			
4a WSEP Sec 1(a)	Develop a legal compliance plan for legal, exporting, data and other requirements.	☒	Legal compliance plan in place 6.1.3.2-F, includes data and other requirements. Other requirements are documented in razor system.
4b WSEP Sec 1(a)	List legal and other requirements and define controls, and monitoring to ensure compliance.	☒	Annual compliance audits are completed; legal list includes requirements and responsibilities to maintain compliance.
4c WSEP Sec 1(a) WSEP Sec 16	Import/Export Compliance	☒	No exports from this facility; all downstreams used are R2v3 no further export compliance required.
4d1,2 WSEP Sec 1(a)	Monitoring Compliance: controls, changes.	☒	Compliance changes are monitored via EHS subscriptions to Ecology and federal information sites by Arnold.
4d3,4 WSEP Sec 13	Periodically audit legal compliance and take corrective actions. 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 Regulatory or Authorized Representative.	☒	Annual compliance audits (internal and from 3 rd part CB) completed and corrective actions in place from 2024 audits.
4d5	Notify CB's with in 30days upon receiving regulatory violations.	☒	Reviewed ECHO reports no current NOV's since process started.

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WSEP Sec 1(b) WSEP Sec 14	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. Processor must notify ecology within thirty days if the direct processor receives any penalties, violations or regulatory orders related to processing activities.		Documentation refers to required notice if violations occur.
4ef WSEP Sec 12	R2 Facility shall not use Child/Forced/Prison labor.	☒	No Prison or forced labor found in use.
4g	Facility has a Non-Discrimination Policy that is communicated to staff.	☒	6..1.3.5P policy in place and posted in break room.
Core Requirement 5 Tracking Throughput			
5a1,2	For all Inbound shipments: BOLs are kept, accurate dates, descriptions and quantities are kept	☒	Razor system used to track all inbound systems.
5a3	A summary of all inbound transactions is maintained.	☒	Summary found in razor system.
5b1	Track, manage, and maintain accurate records of FM's from receipt through processing to shipment.	☒	Razor system tracks all inventory.
5b2	Maintain inventory levels below legal requirement or closure plans.	☒	NC #1 - Inventory level for CRTs found over closure limit listed of 12,000lbs; 13,000 found in razor system.
5b3 WSEP Sec 5(a)(iv)	Not store controlled streams more than 1 year. (except tested working). Not store speculative 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	☒	Oldest piece of equipment found in razor system was dated 285 days old, under 1 year limit. No speculative accumulation done at either site.

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	subject to applicable treatment, storage or disposal regulations or equivalent.		
5c1,2	For all Outbound shipments: BOLs are kept, accurate dates, descriptions and quantities are kept	☒	June 25 reviewed shipment to URT of LCDs and CRTs OUT-10117, BOLs accurate and quantities found.
5c3	A summary of all outbound transactions is maintained.	☒	May O-10000 Shipment to Far West showed misc. electronics, av equipment, ups, and electronic ballasts; Far West not on approved vendor list;
Core Requirement 6 Sorting Categorization and Processing			
6a	Document a process to evaluate, sort, and categorize electronic equipment.	☒	8.1.2-P documented procedure for sorting and categorizations.
6a1-3	Conform with Hierarchy; Include REC categories; Identify Data containing devices.	☒	Found to conform; dedicated area for reuse and testing. Sales in MTS and eBay. Data status is categorized in MTS
6a4	Define criteria for reuse (physical condition, market conditions).	☒	Individual test plans in place for desktop, laptop... that detail conditions.
6a5	Include steps to reevaluate after processing.	☒	Material found to be updated after updates are made.
6b1	All equipment is identified with correct REC categories.	☒	Equipment found with REC categories both on the label and in Razor MTS system.
6b2	All equipment with FM's are managed as Controlled Stream unless: processed by another R2 facility; documentation of evaluation; no longer meets definition of controlled stream.	☒	Don't received/purchased tested items.
6c WSEP Sec 7(b)	The R2 facility will evaluate all equipment in accordance of a Defined Process. 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.	☒	Found in compliance at site tour, electronics are dismantled in commodities at both mechanical (shredding) and manual disassembly.

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6d1	All equipment is evaluated for data and labeled with REC category.	☒	All inbound and outbound equipment found labeled and categorized in MTS. NC #2 - Material in transition (deman and sorting) gaylords found not labeled/categorized until the boxes are filled and weighed.
6d2	Equipment with data is secured to prevent unintended access.	☒	Found in compliance; data is secured in cage and data area.
6d3	Facility shall not sell or donate equipment prohibited by commercial agreements.	☒	Found in compliance, orders we reviewed with mandatory destruction.
6d4	Equipment identified for Reuse shall be Identified with unique identifier single or in groups; Tested per Appendix C, sent downstream, or sold as specialty collectable.	☒	Reviewed SO -603 and found 3 computers sold to Simple Computers Grade B and F-4 hardware functional.
6e1	Equipment deemed Unrestricted Stream shall be identified and managed separately, justification for classification, have records maintained for tracking.	☒	Unrestricted streams found in compliance.
6e2A	REC categorizes are identified and disclosed to buyer for Functionality, Data Sanitization, and Cosmetic condition.	☒	Reviewed eBay website reuseoutlet and found ID numbers, functionality and cosmetic grades listed for multiple items listed on 07/16/2025.
6e2B	Reference the unique identifier in sales or shipping records.	☒	Razor creates unique IDs for all items sold.
6e2C	Shipment is legal if international.	☒	No overseas buyers found.
6e2D	Package to prevent damage in accordance to Core Requirement 10.	☒	All material reviewed found package appropriately.
6e2E	Product return policy was made available to buyer.	☒	Return policy posted on eBay, and plans to post on website.
6e3	If sold as Specialty Collectable cannot exceed 1% of total sales on 12-month rolling average and can be returned at no charge.	☒	Currently not equipment not sold as collectable.
Core Requirement 7 Data Security			
	See Data Security Audit	☒	NA
Core Requirement 8 Focus Material			
8a	R2 Facility shall analyze and review how FM's are managed internally and downstream.	☒	8.1.4.1-P FMMP in place; details how FMs are managed and processed.

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Section	Responsible Recycling Practices (R2v3)/Washinton State Electronics Recycling Program	Audited	Summary/Evidence Reviewed
WSEP Sec 6			
8b	R2 Facility shall manage print cartridges through remanufactures or OEMs.	☒	Cartridges went all printer recycling, no longer approved and no current vendor, now cartridges go too far west.
8c	Non-FM's are managed in full legal compliance and following R2 Hierarchy.	☒	Scrap metal found sent to metal recyclers.
WSEP Sec 9	"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. Residuals must be properly designated and managed under applicable solid waste and hazardous waste laws at the location where disposal occurs. 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. Residuals from processing of materials of concern must not be mixed with other residuals for the purpose of disposal. 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.	☒	All material found to be processed for recycling/legal disposal. Only solid waste is office related trash.
Core Requirements 9 Facility Requirements			
9a	The R2 Facility shall conduct all operations indoors unless controls are in place to prevent uncontrolled releases.	☒	All operations found to be completed indoors

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Section	Responsible Recycling Practices (R2v3)/Washinton State Electronics Recycling Program	Audited	Summary/Evidence Reviewed
9b WSEP Sec 5(b)	All Controlled Stream are stored to prevent adverse weather conditions; in legal compliance; to prevent unauthorized access; are clearly labeled.	☒	Found in compliance at site tours.
9c	Material for reuse is stored protected from the elements.	☒	Found stored in separate area for potential resale only.
9d WSEP Sec 17	The R2 Facility has evaluated its operation and has adequate insurance to cover operations, and coverage for treatment of workers. Processor possesses adequate Comprehensive or Commercial General Liability Insurance including coverage for: (i) Bodily injury, (ii) Property damage, (iii) Pollutant releases, (iv) Accidents and (v) Other emergencies.	☒	COI includes GL, AL, Umbrella, WC, PL, and Cyber Liability, exp 07/01/2026
9e	The R2 Facility maintains a written closure plan.	☒	Facility has 2 closure plans in place
9e1-2 WSEP Sec 18	Closure Plan includes: businesses used to manage electronic equipment, consider risks and any applicable laws.	☒	Both TRI and Eco maintain closure plan with WA Ecology as the responsible party for closure.
9e3	Closure Plan includes: costs for processing inventory, sampling, remediation.	☒	Found in compliance.
9e4	A financial instrument is in place to cover cost of closure.	☒	Closure plan in place; approved by Dept of Ecology and Financial instrument in their name.
9f	The facility is exempt from closure plan if: cost is less than \$10,000; size of the building is less than 1,000 sq/meters; and doesn't accept CRT, Lithium Metal, or PCBs.	☐	NA
Core Requirements 10 Transportation			
10a WSEP Sec 11 (a)(b)	Equipment must be packaged for shipping: legally, to prevent damage, and consider EH&S risk.	☒	Equipment observed found to be in compliance for legal transportation.

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10b	Data: Security measures are planned and appropriate, meet customer requirements, and security controls are in place to conceal package contents from unauthorized access, contracts in place.	☒	Procedure in place address shipping requirements for security of data when in transport
10c	Shipping documentation is accurate and meets regulatory requirements for material shipped.	☒	Found in compliance.
10d WSEP Sec 11(c)	Transporters meet all legal requirements to transport. 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.	☒	Transporters Waste express used for transportation; Vendor qualified by review and questionnaire. Waste Express Vendor Found qualified.
Appendix A Downstream Recycling Chain			
A1	R2 Facility will manage ensure conformance of each vendor or to EOL or to 1 st R2 Facility.	☒	Reviewed downstream list and its lists all vendors to R2 or EOL.
WSEP Sec 15	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. 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. Processor must document the chain of custody of all materials of concern and their residuals through final disposition. Processor does not need to conduct the due diligence for downstream vendors certified to the performance standards in this document by an accredited body.	☒	Reviewed Downstream Vendors Eco lights, complete questionnaire 11/18/2024 RIOS certified, documents with BOL's vendor receive lamps and batteries, due diligence completed annually. IRT receives circuit boards, vendor is R2, 06/10/2024. Doe Run receives LABs checklist completed 06/10/2024.

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A2	If equipment handled has a negative value: P&L insurance is maintained.	☒	Pollution insurance found in place exp date 07/01/2027.
A3	Prior to an international shipment, The R2 Facility shall verify/document the shipment is legal.	☒	No international shipments found.
A4	The R2 facility shall track or demonstrate the complete chain (for FM's) or register with SERI the recycling chain (to first R2v3 facility) and register changes as they occur.	☒	In the process of submitting to SERI before stage 2 audit.
A5	The R2 Facility will provide names and locations of downstream vendors (to R2 facilities) and will notify prior to shipping when changes occur.	☒	Documented in procedures.
A6	The R2 Facility will verify will records controlled streams were accepted at 1 st tier vendors facility.	☒	Reviewed shipment to R2 on 03/26/2025, received payment statement as proof of receipt for \$10,987.
A7	If a downstream vendor is R2 Certified, then verification that the R2 Certification is active with a certification scope, including applicable Process Requirements, consistent with the equipment, components, and materials received and the processes performed, shall qualify the downstream vendor to receive shipments without further downstream tracking and verification.	☒	R3 found to meet scope reequipments for material received. Including data physical and logical.
A8	Non R2 vendors must be audited annually to ensure vendor conforms to the requirements of Appendix A.	☒	Desk top audits are competed on non-r2 vendors
A8a	Non R2 vendors must conform to R2 facilities FMMP/Core 8	☒	LRI reviewed and found to retort mercury meeting facility FMMP requirements.
A8b-c	Non R2 vendors must adhere to documented system for EH&S and Legal Requirements (Core3&4) and maintains a current list/copies of all permits.	☒	LRI reviewed and all permits and EHS plans found in place on share drive.
A8d1	Non R2 vendors performing data destruction (smelts or incineration) must provide written confirmation for processing of all devices.	☒	NA
A8d2-3	Non R2 vendors performing Data Sanitization/Destruction is audited annually by a SERI approved auditor.	☒	NA
A8d4	Non R2 vendors performing Data Sanitization/Destruction provides records of proof of Sanitization	☒	NA

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A8d5	Non R2 vendors performing Data Sanitization/Destruction transfer of controlled streams to qualified vendors.	☒	NA
A8e1-2	Non R2 vendors performing Test and Repair meet the requirements of Core 6 and App C, sells only working equipment.	☒	NA
A8e3	Non R2 vendors performing Test and Repair transfers of controlled streams to qualified vendors.	☒	No no-r R2 for test.
Appendix B Data Sanitization			
	See Data Security Audit	☒	NA.
Appendix C Test and Repair			
C1	R2 Facility is certified to Quality Standard.	☒	Vendor is certified to RIOS standard
C2	R2 Facility shall document procedures for reuse and repair.	☒	Resue plan in place including individual test plans.
C2b	Workers should be trained and found competent.	☒	Workers found trained and competent.
C2c	Product Safety Plan should be in place to address hazards/recalls	☒	Recall list in place; last entry may 2025.
C2d	Testing plans should be in place to address: functions tested for, test methods, pass fail criteria, method of keeping records, REC categorizations.	☒	Found in testing procedures.
WSEP Sec 8 (a)	"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. For a CEP, component or part to be put to reuse it must be fully functioning. CEPs, components and parts gleaned for reuse shall not be included in the weight totals submitted to a plan for compensation.	☒	Equipment reviewed SO-603 3 computers sold to Simple Computer, found Grade B and F-4 Hardware functional in MTS dated 04/09/2025.
WSEP Sec 8 (b)	Before shipping CEPs, components, or parts for reuse, the direct processor must: Test and ensure that the CEPs, components, and parts are functioning properly for the same purpose for which they were originally purchased.	☒	Equipment reviewed SO-603 3 computers sold to Simple Computer, found Grade B and F-4 Hardware functional in MTS dated 04/09/2025.

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Section	Responsible Recycling Practices (R2v3)/Washinton State Electronics Recycling Program	Audited	Summary/Evidence Reviewed
	Accurately label, package, and ship the CEPs, components, and parts in a manner that will minimize damage during transport. A direct processor must verify a legitimate end-use market		Shipping procedure details packaging requirement and facility found to have adequate packaging for shipping protection.
WSEP Sec 10	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. 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. CEPs, components and parts gleaned for refurbishment shall not be included in the weight totals submitted to a plan for compensation. A direct processor must verify a legitimate end-use market for the intended purpose of any CEPs, components or parts shipped for refurbishment.	☒	eBay sales were reviewed and go to end processors; other sales reviewed are to wholesale buyers who sale to end processors. All parts for sale are processed internally and sold on ebay platform.
C2e	Quality Assurance Plans address: verifying accuracy of test records, management of failed equipment, verification of REC categories.	☒	Quality Assurance plan is in each test procedure and complete
C2f	Product return plan is appropriate to final destination.	☒	Product return plan found appropriate to sales buyer's locations; all sales are US based.
C3	R2 Facilities must test material within 1 year from receipt.	☒	No material found over 1 years; reviewed MTS for verification.
C4	R2 Facilities shall: maintain test records for each unique identifier and appropriate REC category.	☒	Found in eBay listing and MTS.
Appendix E Material Recovery			

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Section	Responsible Recycling Practices (R2v3)/Washinton State Electronics Recycling Program	Audited	Summary/Evidence Reviewed
E1	The R2 Facility shall conduct on regular basis hazard assessments.	☒	EHS hazards were revied July 31 2024 and IH study completed June 2025.
E2	The assessment shall be conducted by a trained individual knowledgeable of hazards.	☒	Found in Compliance.
E3	Assessment shall be in writing and incorporated into MS.	☒	Found in writing in MS.
E4	Assessment shall Address: • Wash Facilities • Clean Areas • Transition Areas • No eating or drinking • Prohibition from taking home clothes • Procedures for cleaning PPE • Procedures for cleaning work areas • LOTO Procedures in place • Safety guards • Pre-use Inspection forms • Industrial Hygiene Program (air, noise, wipe sampling) • Risk for Mechanical Separation (evaluated annually) • Air Quality (Mercury) where lamps are removed. • Medical Monitoring	☒	No eating/drinking in facility, uniforms are provided, pre-inspection forms were found being used, safety guards in place, IH completed in 2025, and medical monitoring done annually.
E5	Controls are in Dismantling Operations	☒	Controls found in place include trainings, PPE, assessments, guards and checklists.
E6 WSEP Sec 7(a)(i)(ii)	Prior to shredding FM's are removed, including inkjets/toner.	☒	Inks were sent to R3(R2 Vendor).
E7 WSEP Sec 7(a)(i)(ii)	FM's are sent to licensed/permit facilities for: • Mercury Retort • Circuit Boards -Metal Recovery • PCB – Incineration or HW disposal	☒	All found in compliance, mercury retorted by LRI, CB for metals recovery and no PCBs accepted.
E8	The R2 Facility will maintain P&L Insurance	☒	Policy in place.

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Areas Audited

The table below identifies which elements of the standard have been audited. Any Non-Conformalities or Opportunities for Improvement identified will list listed under Evidence Statements

Standard Section	RIOS QEHS/Washington State Electronics Recycling Program	Audited	Evidence Statements
Section 1.0 General requirements			
1.1	Scope and Application	☒	Scope documented in O-P recycling collection, testing and data destruction of electronics meets TRI requirements.
1.1.1	RIOS Outcomes	☒	Goals and other in place and on pace to achieve.
1.2	QEH&S Infrastructure	☒	Found a positive working environment and both facilities reviewed.
1.2.1	Management Structure	☒	Responsibility Matrix kept and in place details responsibilities and positions.
1.2.2	Resources and Facilities	☒	Both facilities found with adequate resources in place to meet current operational needs; improvements made include adding an MTS last year.
1.2.3	Senior Management	☒	Senior Management works daily with operations; established polies, goals and participates in MR
1.3	Document and Recordkeeping Controls	☒	Document control procedure in place includes master document list, headers, revision dates and documents control numbers. Records documented on 7.5.2.3-F includes retention times and responsibilities.
Section 2.0 Policies			
2.0	Policies comply with all Legal and Stakeholder requirements	☒	Policy in place includes legal and other compliance as well and EHS and pollution prevention. 5.2.1-P
2.0	Policies strive for continual improvement, prevention of injuries and pollution	☒	Policy in place includes legal and other compliance as well and EHS and pollution prevention. 5.2.1-P
Section 3.0 Planning			
3.1	Footprint	☒	Footprint requirements documented in multiple procedures and records including EHS assessments, Quality risks, objectives, interested parties...

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Standard Section	RIOS QEHS/Washington State Electronics Recycling Program	Audited	Evidence Statements
3.1.1	Important Quality Risks	☒	Quality risks documented on 6.1.1-F include controls.
3.1.2	Important Environmental Impacts and Health & Safety Risks. Including: Emissions/Exposure, Noise, Ergonomics, Thermal Stress, Machine Guarding, Cuts and other. Follow controls Pyramid. Document sampling protocols where legally required including any medical monitoring.	☒	EHS risks evaluative on 6.1.1.5; significant risks highlighted in red, risks and hazards found include: Ergonomics, Shredding, Cuts, Exposure, and Noise. Significant hazards include: Chemical, Mercury, Data Breach, Forklifts Medical monitoring completed annually.
3.1.4	Legal, Product, and Other Relevant Requirements	☒	6.1.3.2-F legal compliance list in place; reviewed annually and updated to EHS sites for updates.
3.1.5	Product, Service, and Customer Requirements	☒	Instructions for customer requirements are documented in MTS.
3.1.6	Other Stakeholder Requirements	☒	4.2.1 Interested party analysis conducted and last reviewed 07/30/2024.
3.2	Improvement Planning	☒	0-P written procedure detailing objective planning;
3.2.1	Establishing/Plans for Goal Achievement	☒	Current objectives include reducing mercury exposure, improve satisfaction, lithium battery safety.
3.3	Change Management	☒	1 MOC for getting WAMPA approved for state recycling program; razor MTS implementation in 20204.
Section 4.0 Implementation			
4.1	Training/Recycler Knowledge	☒	Training Matrix in place and in progress for 2025.
4.1.1	Competence	☒	Competence is reviewed after every training complete.
4.1.2	Awareness	☒	Found in compliance.

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Standard Section	RIOS QEHS/Washington State Electronics Recycling Program	Audited	Evidence Statements
4.2.1	Internal Communication	☒	7.4.1.1-P Communication procedure in place; internal communications include email, meetings, positing's, trainings...
4.2.2	Customer Communication	☒	Customer communications documented in eBay and eBay rating of 98.
4.2.3	Supplier Communication	☒	Supplier communications documented on surveys and vendor approvals.
4.2.4	Contractor Communication	☒	Sign in sheet and site rules found on procedure and facility entrance to review.
4.2.5	Interested Party Communication	☐	Not audited.
4.3	Operational Controls	☒	Op controls include procedures for all operations, checklist, PPE, and inspections.
4.3.1	Source Material	☒	8.1.1.1.-F is a not accepted list documented
4.3.2	Outsourced Providers, Products, & Services	☐	Not audited.
4.4	Quality Controls	☒	QCs are completed on weekly checklists reviewed checklist from 06/19/2025.
4.5	Environmental Controls	☒	Controls include procedures for all operations, checklist, PPE, and inspections.
4.6	Health and Safety Controls	☒	Controls include procedures for all operations, checklist, PPE, and inspections.
4.7	Emergency Preparedness	☒	Emergency procedure and contingency plan in place with annual training completed and emergency drills scheduled for 2025 in July.
Section 5.0 Checking and Corrective Action			

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	AD-17 R2v3 RIOS WA State Recycling Program Internal Audit Form	
	Revision Date: 05/29/2025	Revision #: 1.0

Standard Section	RIOS QEHS/Washington State Electronics Recycling Program	Audited	Evidence Statements
5.1	Monitoring and Measurement	☒	9.1.1.1 details what is monitored and timeframes. Compliance calendar was reviewed and found current.
5.1.3	Maintenance and Calibration of Monitoring Equipment	☒	Jerome meter and scales all found with current calibration.
5.1.4	Analysis of Monitoring and Measurement Results, Results should be part of MR	☒	Reviewed in last MR.
5.2.1	Control of Nonconforming Product	☒	Form is completed for non-conforming products received, Vape waste was documented and returned to supplier.
5.2.2	EH&S Incident Investigations	☒	2 injuries in 2024 and incident reports were completed.
5.2.3	Nonconformances and Corrective Actions	☒	Found in system and previous CB NCs reviewed and found completed/closed.
5.3	QEHS Management System Audits	☒	Completed annually
Section 6.0 Management Review			
6.0a	Inputs include: Audit results, feedback from customers/stakeholders, goals, CARs, follow-up, scope, quality and EHS impacts, Monitoring and Measurements	☒	MR completed annually and last review completed July 2025.
6.0b	Outputs include: Product/service improvements, continual improvements, resources needed	☒	Found in compliance.
6.0c	QEHS performance is communicated	☒	Results are posted in facility.
	Other Findings/Previous Non-Conformance Review:	☒	Reviewed previous audit NCs and all found completed and closed.