

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

Washington State Preferred Performance Measures
for Direct Processors

WAC 173-900-650

Facilities Audited: Kent Facility of EWC Group Inc., 22633 83rd Avenue South, Kent,
Washington 98032, United States

Auditors: James Rod Gonzalez, QEP, and Kelley Keogh
Date: August 19, 2025

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 this audit has been performed to confirm that operations meet the expectations of the requirements.

The EWC Group facility is a leased portion of a warehouse located at 228 Building B, 22633 83rd Ave South, Kent, WA 98032. EWC moved from its prior location in September 2022. The warehouse facility is approximately 12,000 sq ft and consists of a large open area with two loading docks, a third rollup door at street level and a smaller (approx. 1300 sq ft) attached office space. It currently has 12 employees in addition to its president. The current senior member of staff is Bryce Froberg, President.

EWC Group’s EHSMS system manages non-conformances by the corrective action preventive action (CAPA) process. All the issues that have been identified will be managed appropriately to resolution and to prevent recurrence.

Employees demonstrated proficiency in their job duties and the management system in general. The EWC staff demonstrated strong commitment to the management systems and the overall QEHS performance of the company.

The conclusion of the auditor is that EWC Group’s facility meets all minimum and preferred standards. This report presents the results and findings from the audit.

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

Per EWC Group's Direct Processor Performance Standard document, EWC evaluates its management strategies as needed to assure that EWC is up to date on newer technologies that could be more advantageous than current practices and processes, reflecting a commitment to continuous improvement.

2. Legal Requirements – Facility Maintains Conformance with Standards

Per EWC Group's Direct Processor Performance Standard document (dated 12/31/2021), p.9, EWC will comply with all federal, state, and local requirements.

During the audit and staff interviews, there were some minor findings of federal, state, and or local regulations. All such findings are identified at the end of this audit report.

During the audit and staff interviews, no non-conformances of federal, state, or local regulations were noted regarding air emissions and water and stormwater discharges. There were some recommendations.

To date, EWC has not incurred financial penalties, regulatory orders, or violations, and interviewed staff indicated that they are aware of whom they are required to inform in the event that they incur such a penalty in the future.

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

EWC has developed a written EHSMS within the EWC Group's Direct Processor Performance Standard document. EWC has fully implemented their EHSMS.

The EHSMS includes plans and procedures covering the required topics. Interviews conducted during the audit did not indicate any deviation from these policies.

General environmental goals, objectives, targets, and plans to achieve them are identified within the document. Environmentally sound and safe methods for processing/dismantling LED/LCD panel displays were observed at the time of the audit.

EWC has prepared an Emergency Preparedness and Response Plan and has committed to providing management support throughout the operations.

Employee training records from initial training (Hazard Communication and Injury and Illness Prevention Program) and regular safety meetings were examined, and all employees had signed off on receiving the training. Monthly safety meetings have been held monthly to July 2025. All employees had signed off as participating in the meetings.

EWC reviews all downstream vendors for labor, health, and environmental standards at least every 3 years. Currently, EWC utilizes two vendors to receive materials of concern. These vendors are [REDACTED] and [REDACTED]. EWC has documentation to verify downstream vendors' certifications and licenses, and vendors' compliance with environmental, health, and safety standards.

EWC's Direct Processor Performance Standard, which contains their EHSMS, assimilates most of the elements required for conformance with ISO 14001, although the system is not third-party certified as conforming to ISO 14001.

Findings:

NC 01 – Noted no fall prevention across the loading doors.

4. Recordkeeping – Facility Maintains Compliance with Standards

Per EWC Group's Direct Processor Performance Standard document, EWC has a policy to retain all transaction records for at least 3 years. During the audit, EWC showed the auditor the electronic filing used to keep such records, which was complete. During interviews, EWC staff indicated that they understood the three-year requirement for maintaining records.

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

During the audit, all steps to ensure recycling were being taken. All staff interviewed indicated that no MOCs go to the landfill; all are recycled.

During the audit, all handling and storage areas were observed to be neat, and regular sweeping was taking place. Staff are aware of the requirement not to accumulate MOC for longer than 180 days. All storage containers examined were marked with the accumulation start dates. No MOC accumulation start dates were earlier than August 2025.

The latest servicing and calibration of the scale was performed on 06/02/2025, by Meridian Scale and is due again 12/31/2025. The calibration certificate was provided for inspection by the auditor. The calibration certificate indicated no problems with the scale.

EWC's storage area is entirely indoors and is raised above ground level, with stairs at the front of the building and a slope at the rear side door. Responsibility for hazard identification and assessment is the responsibility of management and employees. EWC Group's workspace is well-lit and well-ventilated.

EWC disassembles CRT containing devices to bare tubes. They have not performed recent industrial hygiene testing to confirm that there is no dust exposure to their employees.

Reviewed monthly safety meetings from January 2025 to July of 2025. Three of the eight meetings listed covered a safety-related topic.

Most employees are long-term, and they all gave the impression that they are treated by EWC with the standard of care established in its EHSMS.

Employees are encouraged to talk with the general manager or their own manager if they have safety concerns. Employees interviewed indicated that they felt the facility was safely operated, with very few safety concerns. All employees indicated that if a concern arose, they would contact their supervisor or one of the senior managers for direction.

EWC employees are required to wear personal protective equipment, including, among other items, boots, safety glasses, and masks as needed. EWC Group's Direct Processor Performance Standard describes the requirement for training regarding protective equipment as part of each employee's training record.

Finding:

NC 02 - EWC does not secure possible data-bearing devices while in-house or during transport.

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

EWC has identified all sources of materials of concern (MOC's). EWC has identified CRT Glass, Circuit Boards, Batteries, and Mercury Devices as MOC's. Disposition of each material is managed by downstream vendors who EWC has vetted.

Findings:

NC 03 –Gaylords for CRT tubes are not lined with plastic.

EWC has further identified materials of non-concern generated in their workplace as Steel, Plastics, Insulated Wire, and Aluminum.

Reviewed the vetting files for:

[REDACTED]

- Sampled BOLs and acknowledgments of receipt for the following commodities – Lilon batteries, LCD Back Lights, UPS Batteries, and Laptop batteries

[REDACTED],

- Plasma backing units (glass), motherboards, mix wire speakers, CRT glass, scrap laptops, HDD (Unsanitized), power supplies, and fans.

7. Recycling - Facility Maintains Compliance with Standards

EWC Group has specific procedures for responsibly managing, classifying, and storing materials of concern and all other materials. CRT glass and fluorescent tubes from LCD screens were packaged in a separate area, in a way that minimized the likelihood of breakage and thus a release to the environment of any hazardous substance. The auditor also viewed separate storage for circuit boards and batteries.

During the site visit, the auditor observed dismantling and separation to the highest marketable levels. Management indicated that no e-waste currently goes to a landfill from the EWC facility.

8. Reuse - Facility Maintains Compliance with Standards

EWC Group is not testing devices for refurbishment and reuse.

9. Disposal of Residuals - Facility Maintains Compliance with Standards

EWC Group company goal is to send little to no waste to incinerators or landfills. EWC Group pledges to properly designate and manage residuals under applicable solid and hazardous waste regulations. They further commit to not send residuals containing materials of concern to incinerators or solid waste landfills.

10. Refurbishment - Facility Maintains Compliance with Standards

See reuse section.

11. Transport – Facility Maintains Compliance with Standards

EWC Group assures that its MOCs are transported appropriately to prevent spillage, breakage, contamination, or any other risks posed to public health or the environment. During the audit all MOC, components, and residuals were packed securely in preparation for transport in compliance with transport laws.

EWC shared with the auditor written documentation dated October 20, 2022, regarding the regulatory authorizations and absence of significant legal violations during the past three years for its transporter, Best Bay Logistics Inc.

12. Prison Labor – Facility Maintains Compliance with Standards

EWC does not hire federal or state prison inmates.

13. Facility Access – Facility Maintains Compliance with Standards

EWC will allow Ecology, third-party observers (for the purpose of sampling), and members of the Authority access to its facilities for the purpose of assessing compliance. Staff indicated that they were familiar with this requirement.

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

EWC will notify Ecology within 30 days if EWC receives any penalties, violations, or regulatory orders related to processing activities.

15. Due Diligence Downstream - Facility Maintains Compliance with Standards

EWC has pledged to partner only with downstream vendors meeting EWC's labor, health, and environmental standards. EWC reviews all downstream vendors annually and is prepared to provide documentation upon request. The facilities flow diagram/matrix is attached, and all vendors and the materials they receive are easily reviewed using the site's Google Drive.

EWC shared vendor audit questionnaires attesting to their compliance with environmental, health, and safety regulations. All were dated between July and August 2023. During interviews, EWC staff members were clearly committed to ensuring that their materials are not passed downstream to companies with poor environmental records.

During the audit, the chain of custody records was inspected for shipments containing materials of concern. For each shipment, an invoice or certificate was provided verifying disposition by a conforming downstream vendor to the end of life.

16. Exporting – Facility Maintains Compliance with Standards

EWC pledges to ensure that MOCs, components, and residuals are legally accepted by any importing countries. EWC prefers to export to OECD nations and currently exports materials of concern only to OECD countries. All materials of concern are sent to [REDACTED], which is certified to RIOS: 2016 and R2V3 Responsible Recycling by Orion Registrar, Inc. through March 2025.

If EWC decides to collaborate with a vendor from a non-OECD country, staff indicated that EWC will obtain the necessary documentation from the government entity legally responsible for transboundary transactions prior to shipment.

In addition, as required by WMMFA, EWC keeps on site all the required information regarding disposition of materials of concern. The most recent shipping paperwork was compared with the mass balance report and appeared to be consistent.

17. Insurance - Facility Maintains Compliance with Standards

EWC maintains insurance to cover bodily injury, property damage, pollutant damage, accidents, and other emergencies. EWC provided a Certificate of Insurance in the following amounts and expiration dates:

- Commercial General Liability \$2M Expires 01/19/2026,
- Pollution Liability \$1M Expires 01/19/2026,
- Automobile Liability \$2M Expires 09/29/2025, and

- Property Insurance - \$15K – Expires 09/29/2025.

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

EWC has estimated costs for a third-party closure at \$62,024.82 and has established a bank trust account in the amount of \$61,631.90. The account is in the name of the State of Washington.

19. Facility Security - Facility Maintains Compliance with Standards

EWC Group does not have a third-party alarm company monitoring the facility. The site has three doors that can be accessed using the same key. The facility has three cameras with approximately 4-6 weeks of recording time, one in the office area, one in the warehouse, and one showing the parking lot.

Findings

The auditor noted the following Non-Conformances and Opportunities for Improvement during August 19, 2025, audit at the EWC Group Kent Washington, facility:

Section 3 – Environmental, Health, and Safety Management System EHSMS

NC 01 – Noted no fall prevention across the loading doors when no vehicle was there.

Section 5 – Onsite Requirements

NC 02 - EWC does not secure possible data-bearing devices while in-house, and during transport.

Section 6 – Materials of Concern

NC 03 –CRT Gaylords are not lined with plastic.

Auditor Qualifications

The auditor is certified by the State of WA DOE to perform this audit. Bob Delich is the Co-Founder/Managing Director of Greeneye Partners, LLC., for whom James Rod Gonzalez 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.