

Environmental, Health and Safety Compliance and
Systems Audit in Response to:

Washington State Preferred Performance Measures
for Direct Processors

WAC 173-900-650

Facility Audited: Total Reclaim Inc.

Auditor: Bob Delich

Date: 04-23-2024

Scope of Audit

This custom 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 audit preparation included an interview with the facility Environmental Health and Safety Manager, Arnold Diep, to go over any EHSMS or operational changes. The internal audit of the RIOS:2016 and R2V3 system was conducted at the same time on April 23rd, 2024.

Facility is located at:
7021 S 220th St,
Kent, WA 98032

Audit Summary

Facility Information:

EPA# WAH000056160

Size: Approx. 50,000 square feet.

Facility age: Built 1986

Hours: 7:00am-3:30pm 5 days

Combined sites # of Employees: 50 FT employees

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

The Facility Maintains the Quality Environmental Management System Manual Section 10 – addresses continuous improvement through management and operational evaluations. The 7021 S 220th St, Kent, WA 98032 facility is RIOS 2016 Certified Exp. 02-25-2027.

2. Legal Requirements – Facility Maintains Compliance with Standards

Currently the facilities maintain compliance with all legal requirements pertaining to their operations. Permits and plans are in conformity with actual operations, which were reviewed and confirmed during the original site visit. The facility conduct audits of their downstream vendors to R2V3 requirements. Permits and written plans conformity with actual operations were reviewed and confirmed during site visit.

3. Environmental, Health, and Safety Management Systems – Facility is certified to RIOS. Recycling Industry Operating Standard (RIOS) is created specifically for the recycling industry. It integrates generally accepted practices of management systems focused on Quality, Environmental, and Health & Safety management (QEH&S). This allows for more straightforward language and requirements specific to recycling. The RIOS management system includes plans to assure product quality of recyclable materials and reusable equipment, environmental protection from recycling activities, and health and safety to protect workers and the community. Predicated on an approach of risk-based management, the RIOS management system is intended to proactively manage these elements. The approach is focused on planning for risks, implementing controls, and monitoring and measuring performance to achieve managed levels of acceptable risk and continuous improvement. *The company wide QEH&S is audited and updated, as new procedures are implemented, or as new materials is accepted. The EHSMS contains a diligent “Plan, Do, Check” component, which manages change and issues through constant management review. The system is 3rd party reviewed annually during surveillance audits required by these certifications.*

The worded with the Puget Sound Clean Air Authority to get a Notice of Construction No. 11798, for the construction of an e-waste shredder that is currently shredding low grade ewaste, plastic housing, ferrous and nonferrous metals.

4. Recordkeeping – Facility Maintains Compliance with Standards

Reviewed the Document and Record Control Procedure, rev 1.0. Documents and records included in the QEH&S management system are listed on the Master Document List and Records Management Table.

Records are controlled according to the Document and Record Control Procedure. Records are listed on the Records Management Table. Records are kept for three to five years, except for H&S records which are kept for 30 years after employment. All requested records were available unless otherwise noted.

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

Material is handled, packaged, and stored in compliance with the standard. Worker safety is protected through engineering controls and was observed by auditor. Workers wear and maintain PPE. The health and Safety training is consistent with requirements for the operation and the facility has systems in place to ensure employee comprehension. IH Monitoring and medical reviews are conducted as appropriate. TRI is pro-active regarding new processes and appropriate testing is conducted as implementation begins.

Reviewed IH air monitoring completed by CTEH on 12-20-21. Samples were taken from employees in the following work areas: HVAC and refrigerant teardown, Shredder Operator, Battery Line Operator, and Forklift Operator. All air samples were below the permissible exposure limit.

Reviewed Noise Monitoring conducted by Washington Audiology Services inc. on 6-2-21. The monitoring was taken with three static meters all three of which read over 85 db. A Hearing Conservation Program is required for the Shredder and Logger operators. It was recommended that the entire warehouse be under a hearing conservation program. Reviewed Hearing Protection fit records and baseline tests for employees dated 6-15-23.

Reviewed scale calibration dated 12-29-23 for 4 scales. Calibration was performed by Cheyanne Scale Company.

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

The auditor observed Materials of Concern (MOC) being handled in accordance with standards. A MOC flow chart is attached. The auditor verified that all downstream vendors for MOC's handle material per the WA State DOE Standards. Total Reclaim agrees to notify the WA State DOE of vendor changes for all MOC's and has built this into their QEHSMS.

7. Recycling – *Facility Maintains Compliance*

Materials managed to ANSI and OSHA standards - observed during site visit. Auditor observed dismantling and separation to marketable levels for the best use and highest grade of recycling and a very clean and efficient warehouse processing area.

8. Reuse - *Facility Maintains Compliance with Standards*

The reuse and refurbish department meet all the WA State Processor requirements as well. Auditor observed complaint practices during audit.

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

Facility waste management follows state and federal guidelines as observed by auditor. No materials of concern go to landfill or incineration. Waste is managed and separated to minimize material going to landfill.

10. Refurbishment - *Facility Maintains Compliance with Standards*

TRI has a reuse and refurbish department. Auditor observed [REDACTED] software to test and erase hard drives, cell phones, desktops, and laptops.

11. Transport – *Facility Maintains Compliance with Standards*

Auditor observed appropriate packaging and labeling of all material. Facility uses company drivers for most transportation - trains online in DOT procedures - contracts with [REDACTED] and other DOT permitted transporters.

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

TRI does not use prison labor.

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

TRI allows WA DOE full record and site access (auditor discussed with management team).

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

TRI agrees to notify WA State DOE of any violations or penalties incurred on behalf of operations within 30 days of notification.

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

CRT Glass and Plastics – [REDACTED] Oregon, they certified to e-Stewards, and R2V3.

Circuit Boards – [REDACTED] Minnesota, they are certified to R2V3.

Batteries (all chemistries but lead acid) - [REDACTED] Michigan, they are certified to R2V3.

Batteries (lead acid) – [REDACTED].

Printers – [REDACTED] certified to R2v3 and RIOS.

See attached Material of Concern Chart.

16. Exporting – *Facility Maintains Compliance with Standards*

Reviewed the Import Export Requirements Summary List, which shows all focus material is sent to R2V3 certified companies and therefore exports do not need to be tracked to final destination.

17. Insurance - Facility Maintains Compliance with Standards

TRI maintains more than adequate insurance to cover their employees, operations, and pollution liability. The facility holds the following insurances, which are valid through 7/01/2024.

General Liability: \$1,000,000 per occurrence / \$2,000,000 aggregate

Automobile Liability: \$1,000,000 Combined Single Limit

Excess Liability: \$5,000,000 per occurrence / \$5,000,000 aggregate

Workers Compensation: \$1,000,000 each/ \$1,000,000 disease

Pollution Liability: \$5,000,000, \$25,000 deductible

Cyber Liability: \$1M

Crime: \$100K

18. Closure EHSMS and Financial Responsibility – Facility Maintains Compliance with Standards

Reviewed E-waste Recycling Facility Closure Plan-v3.0 with Closure Cost Estimate Total Reclaim received quotes from [REDACTED] dispose of any CEPs that the facility cannot process at the time of closure and to implement and certify this Closure Plan. The closure cost is estimated to be \$21,245.95. The closure cost estimate will be adjusted annually for inflation as specified in WAC 173-303-620(3)(c)(i) and (ii). Costs for closure labor, equipment, and analytical services are based on currently available rates. Total Reclaim will meet the financial assurance requirements specified under WAC 173-303-620(8) through liability insurance issued by Acord.

Review Refrigerant Reclaim Closure Plan_v3.0 with Closure Cost Estimate. Total Reclaim received quotes from [REDACTED] to dispose of any refrigerant inventory present at the time of closure and to implement and certify this Closure Plan. The estimated closure cost is \$54,470.00. Total Reclaim uses a Standby Letter of Credit (LOC) as its financial assurance mechanism for closure. Total Reclaim meets the financial assurance requirements specified under WAC 173-303-620(8) through liability insurance issued by Acord.

19. Facility Security - Facility Maintains Compliance with Standards

TRI uses alarm systems that is monitored 24/7 by a third party. Visitors sign in and are escorted onsite. Managers access to the building and let. Keys are used to access Asset Management Department's and storage trailers. Facility has 10 cameras with recordings stored on a DVR for at least 90 days.

Auditor Qualifications

The audit was conducted by Bob Delich an ISO 9001, ISO 14001, ISO 45001, RIOS, e-Stewards and R2 internal auditor. Bob is the Director of Operations for Greeneye Partners, LLC. The audit review was conducted by Kelley Keogh co-founder of Greeneye Partners, LLC. The State of Washington's DOE maintains Bob Delich's and Kelley Keogh's auditor qualifications on file.