

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: September 27, 2023

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 14 employees in addition to the 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 Compliance with Standards

Per EWC Group’s Direct Processor Performance Standard document (dated December 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 violation of federal, state, or local regulations were noted regarding air emissions and water and stormwater discharges. There were some recommendations (Opportunities for Improvement – OFI’s) made regarding workers’ health and safety.

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 the 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 throughout 2023. All employees had signed off as participating in the meetings.

EWC pledges to review 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] in Oregon, and [REDACTED] IA 50313. 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.

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 CEPs (Covered Electronic Products) nor components go to the landfill; all are recycled in some way.

During the audit, all handling and storage areas were observed to be tidy and regular sweeping was taking place.

During interviews, staff indicated that they were aware of the requirement not to accumulate CEPs for longer than 180 days. All storage containers examined were marked with the accumulation start date. No CEPs were observed in the warehouse with an accumulation start date earlier than August 2022.

The latest servicing and calibration of the scale was performed on 06/20/2023, by Meridian Scale and is due again 12/31/2023. 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. During the audit, several stacks of Gaylords were at four high without using any setback for the top level and appeared to be secure.

Responsibility for hazard identification and assessment is the responsibility of management and employees.

EWC Group's workspace is well lit and well-ventilated.

While there is no shredding, or grinding, EWC disassembles CRT containing devices to their bare tube. During the removal of the outer casing, it is known that collected dust is re-entrained into the workers breathing space and the site has not performed any recent industrial hygiene testing to confirm that there is no dust exposure to their employees.

Reviewed monthly safety meetings from January 2023 to August of 2023. Three of the eight meetings listed covered a safety-related topic.

During the audit, it was identified that many of the employees are long-term with the most recent employee having been with the company about eight weeks. Employees 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.

6. Materials of Concern - Facility 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 to downstream vendors who EWC has vetted.

EWC has only recently started dismantling laptops and has not yet shipped out batteries to a downstream vendor. They are in the process of updating their vetting file for the vendor prior to any shipments.

EWC has further identified materials of non-concern generated in their workplace as Steel, Plastics, Insulated Wire, and Aluminum. **(See pages 10, 11, 12, and 13)**

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 internal audit 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 CEP's for refurbishment and or 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 CEPs, CEP components, materials, and residuals will be transported appropriately so as to prevent spillage, breakage, contamination, or any other risks posed to public health or the environment. During the audit all CEPs, components, and residuals were packed securely in preparation for transport in compliance with transport laws.

Per management, EWC assures that its CEPs, CEP components, materials, and residuals are transported appropriately so as to prevent spillage, breakage, contamination, or any other risks posed to public health or the environment. During the audit, all CEPs, 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 participate in the hiring of 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 material they receive are easily reviewed using the sites 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 end of life.

16. Exporting – Facility Maintains Compliance with Standards

EWC pledges to ensure that CEPs, 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] Oregon, which is certified to RIOS: 2016 and 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 trans-boundary 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 01/19/2024 (See page 14),
- Pollution Liability – \$2M – Expires 01/19/2024 (See page 14),
- Automobile Liability - \$2M – Expires 12/17/2023, and
- Property Insurance - \$15K – Expires 10/19/2023.

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

EWC has estimated costs for a third-party closure at \$53,636.00 and has established a bank trust account in the amount of \$292,000.68, which is far in excess of the cost to close.

Based on the review of the closure cost estimate it is the auditors opinion that EWC Group should consult with the State to reassess the amount of the financial responsibility they have in place to reduce it to less than \$100,000.

19. Facility Security - Facility Maintains Compliance with Standards

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

Findings

EWC Group's third-party internal auditors, James Rod Gonzalez noted the following Non-Conformances, Areas of Concern, and Opportunities for Improvement during the September 27, 2023, internal audits at the EWC Group Kent Washington facility:

Non-conformances

NC 01 – Observed Universal Waste Fluorescent Tubes not labeled with Universal Waste and a satellite station not covered when not in immediate use.

NC 02 – Fire extinguishers are not being inspected monthly.

Areas of Concern

AOC 01 – The facility uses box cutters that are not self-retracting which creates a significant hazard for cuts.

AOC 02 – EWC Group is performing tear down of CRT containing devices, and baling plastic, and has not performed air and noise testing.

AOC 03 – EWC does not secure potential data bearing devices removed from devices during tear down from pilferage while in the facility.

AOC 04 – EWC has a bank trust account to support the closure of the facility. Based on the review of the closure cost estimate it is the auditor's opinion that EWC Group should consult with the State to reassess the amount of the financial responsibility they have in place to reduce it to less than \$100,000.

Opportunities for Improvement

OFI 01 – EWC should consider padding all edges where employees are leaning up against work benches to perform the job task (pool noodles).

OFI 02 – EWC should consider modifying work benches to be no more than waist height.

OFI 03 – EWC should consider moving away from pistol grip powered drills and to straight line ones instead to reduce upper extremity stressors.

OFI 04 – EWC when updating their EWC Direct Processor Performance Standard should consider identifying their Injury & Illness Prevention Plan (IIPP) as the equivalent to the Washington State "Accident Prevention Program" which is the States required version of the IIPP.

OFI 05 – EWC should consider enhancing the driver management/training program to include defensive driver training, cellular phone policy signed by the driver, annually pulling driver record, and mount a universal hands-free device in their vehicles.

OFI 06 – EWC should consider having a “Safety Topic” for each of their safety meetings. For 2023 to date only three of the eight meetings identified a safety topic.

Auditor Qualifications

The auditor is certified by the State of WA DOE to perform this audit. Kelley Keogh is the Co-Founder/Managing Director of Greeneye Partners, LLC., for whom 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.

Materials	Recycling Process	Fate of Recycling Process	End-of-life Processing Destination Country	End-of-Life Processing Company
Materials of Concern				
CRT Glass	Manually removed from CEP; separate panels, metals, and all other residuals	Glass to glass; all materials reused in new glass products	U.S.	<p>For Processing:</p> <p>████████████████████ ████████████████████ ████████████████████</p> <p>For Use and Purpose:</p> <p>██ ████████████████████ ████████████████████</p>
Circuit Boards	Manually removed from CEP	Primary smelter for precious metal recovery	U.S./Japan	<p>For Processing:</p> <p>████████████████████ ████████████████████ ████████████████████</p> <p>For Use and Purpose:</p> <p>██ ██</p> <hr/> <p>██ ██ ██</p>

				<p>For Use and Purpose:</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
Batteries	Manually removed from CEP and sorted by type	Metal Recovery	U.S.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <hr/> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>For Use and Purpose:</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
Mercury Devices	Manually removed from CEP, managed as Universal Waste	Mercury recovery	U.S.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <hr/> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>For Use and Purpose:</p> <p>[REDACTED]</p> <p>[REDACTED]</p>

Materials of Non-Concern				
Steel	Manually removed from CEP	Metal recovery	U.S./Hong Kong	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
Plastics	Manually removed from CEP	Plastic Recovery	Malaysia	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>For Use and Purpose:</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <hr/> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>For Use and Purpose:</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
Insulated Wire	Manually removed from CEP	Primary smelter for precious metal recovery	U.S./Japan	<p>For Processing:</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>

				<p>For Use and Purpose:</p> <p>[REDACTED]</p> <hr/> <p>[REDACTED]</p> <p>For Use and Purpose:</p> <p>[REDACTED]</p>
Aluminum	Manually removed from CEP	Metal Recovery	U.S.	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>



EWCGR0U-01

JSAINTDENIS

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

9/14/2023

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER PLC Insurance Services 19401 40th Ave W, Suite 440 Lynnwood, WA 98036	CONTACT NAME: Jamie Saint-Denis PHONE (A/C, No, Ext): FAX (A/C, No): E-MAIL ADDRESS: jamie@plcins.com <table style="width: 100%; border: none;"> <tr> <td style="width: 80%; text-align: center;">INSURER(S) AFFORDING COVERAGE</td> <td style="width: 20%; text-align: center;">NAIC #</td> </tr> <tr> <td>INSURER A: Crum & Forster Specialty Ins Co</td> <td style="text-align: center;">44520</td> </tr> <tr> <td>INSURER B:</td> <td></td> </tr> <tr> <td>INSURER C:</td> <td></td> </tr> <tr> <td>INSURER D:</td> <td></td> </tr> <tr> <td>INSURER E:</td> <td></td> </tr> <tr> <td>INSURER F:</td> <td></td> </tr> </table>	INSURER(S) AFFORDING COVERAGE	NAIC #	INSURER A: Crum & Forster Specialty Ins Co	44520	INSURER B:		INSURER C:		INSURER D:		INSURER E:		INSURER F:	
INSURER(S) AFFORDING COVERAGE	NAIC #														
INSURER A: Crum & Forster Specialty Ins Co	44520														
INSURER B:															
INSURER C:															
INSURER D:															
INSURER E:															
INSURER F:															
INSURED EWC Group, Inc 20413 87 Ave S Kent, WA 98032															

COVERAGES

CERTIFICATE NUMBER:

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER:			EPK142616	1/19/2023	1/19/2024	EACH OCCURRENCE \$ 2,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 100,000 MED EXP (Any one person) \$ 10,000 PERSONAL & ADV INJURY \$ 2,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000 WA STOP GAP \$ 1,000,000
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
	<input type="checkbox"/> UMBRELLA LIAB <input type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED RETENTION \$						EACH OCCURRENCE \$ AGGREGATE \$ \$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) Y/N N/A If yes, describe under DESCRIPTION OF OPERATIONS below						PER STATUTE OTH-ER E.L. EACH ACCIDENT \$ E.L. DISEASE - EA EMPLOYEE \$ E.L. DISEASE - POLICY LIMIT \$
A	Pollution Liability			EPK142616	1/19/2023	1/19/2024	\$10,000 Ded - Agg: 2,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
Evidence of Insurance

CERTIFICATE HOLDER

CANCELLATION

Evidence of Insurance	<p style="text-align: center; font-size: small;">SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.</p> <p style="text-align: center; font-size: x-small;">AUTHORIZED REPRESENTATIVE</p>
-----------------------	--

ACORD 25 (2016/03)

© 1988-2015 ACORD CORPORATION. All rights reserved.

The ACORD name and logo are registered marks of ACORD

EWC Cleanup Worksheet

The following cleanup cost estimates will be generated based upon the maximum volume received within our facility.

Part 1 Cost for Removal & Treatment	Quantity (Unit)	Cost (\$)/Unit	Cost
UWEDs/CRTs (unprocessed devices)	UWED 100 lbs.		\$155
	CEPS 16,154 lbs.	\$155 (transport to local facility via company/ rental trucks) x 1 trips	\$155
UWEDs/CRTs (disassembled but not treated)	UWED 0 lbs.	\$75 (transport to local facility via company/rental trucks) x 0 trips	\$0
	CRT (Bare) 127,199 lbs.	\$800/container x 3 containers	\$2,400
(components accumulated from operations such as metal, plastic, wire, etc.)	193,003 lbs.	\$125 (transport to local facility via company/rental trucks) x 5 trips	\$625
(Wood accumulated from operations)	0 lbs.	\$350/container (Max capacity 14,000 lbs) x 1	\$0
(UW Batteries)	0 lbs.	\$1.45/lb.	\$0
(UW Lamps)	3,945 lbs.	\$3.00/lb.	\$11,835.00
CRTs (Cost to treat glass)	127,199	.15/lb. fee to transport/process	\$19,100.00
UWEDs/CRTs Labor for handling prior to shipping	UWED CRT 8 Hours (1 days)	\$20/hr. x 3 staff x 8 hr. x 1 day	\$480.00
Part 1 Subtotal		\$34,595.00 (Based on highest monthly calculation)	

Part 2 Decontamination Cost	Quantity (Unit)	Cost (\$)/Unit	Cost
Clean walls, floors, beams, light fixtures, and equipment (bailer, CRT conveyors, etc.)	1 equipment rental (i. e., pressure washer, HEPA Vacuums, safety equipment)	\$1500	\$1,500
Labor for cleanup (own employees) (Dry sweep, HEPA vacuum, pressure wash equipment)	2 people @ 3 days	(8hrs. x \$22 x 2) x 3 days	\$1,056.
Containment for solid waste generated during decontamination.	10 drums for debris collected.	\$45/drum	\$450
Disposal of waste solid waste generated.	4 drums	\$675/drum	\$2700
Wash water generated Testing Fee	10 Tanks 1000 Gallon	\$30 \$0.75	\$300 \$750
Wash water generated proper disposal Fee.			
Part 2 Subtotal		\$6,756.00	

Part 3 Sampling Cost	Quantity (Unit)	Cost (\$)/Unit	Cost
Wipe Samples: Stratum 1	5		
Stratum 2	5	\$35	\$525

Stratum 3	5		
Wipe Sample Laboratory Analysis	5	\$75	\$375
Chip Sample Laboratory Analysis	4	\$50	\$200
Sample Labor	4 hrs.	\$14	\$48
Part 3 Subtotal		\$1148	

Part 4 General Supervision	Quantity (Unit)	Cost (\$)/Unit	Cost
General Supervision	General Supervision will be executed by the President, Vice President, and General Managers at the time of closure.		
Review by Certified Engineer for closure certification	1	\$1500	\$1500

Subtotal Parts 1-4	\$44,000.00
Contingency (@ 15%)	\$6600
Total	\$50,600
Annual Inflation Factor (6.65%)	\$3036
Total Closure Cost	\$53,636.00

Revised – September 2023