

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

Washington State Preferred Performance  
Measures for Direct Processors

WAC 173-900-650

Facility Audited: Ace Metal Corporation  
Mukilteo, WA 98275

Auditor: James Rod Gonzalez, QEP  
Date: August 20, 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 a facility checklist was prepared to meet the standards requirements that related directly to the operations. The audit consisted of confirming the nexus between the two documents and the operations.

The Environmental, Health and Safety management system manages non-conformances with a corrective action process reviewed them in their weekly Management Review meetings. Reviewed the Management Review meeting from 07/25/2025, during which they reviewed the findings from the 07/23/2024 WMMFA Audit

### **The facility audited:**

Ace Metal Corporation 11110 Mukilteo Speedway, Mukilteo, WA 98275. The audit was performed on August 20, 2025.

The site manages EHS responsibilities with a simple, non-certified EMS supported by a consultant. The facility is well run and operates efficiently. Employees demonstrated proficiency in their job duties and the management system in general. The Ace staff demonstrated strong commitment to the management system and the overall QEHS performance of the company. The Vice President, Imee Yoo, was in attendance and provided all documents and the site tour.

### **Audit Summary**

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

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

Inherent in the Washington State Department of Ecology Preferred Performance Standards for Direct Processors of Electronics Processors - WAC 173-9000.

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

The facility has annual inspections from the City of Mukilteo and the Department of Ecology. The site was last inspected by the Mukilteo Public Works on May 5<sup>th</sup>, 2024. At the time, they noted an exceedance of a sampling result.

Reviewed the sample taken on 06/02/2025, which was elevated for Zinc. The site employs the usual tactics to reduce the Zinc load in its outfall, such as ensuring covering of bins, regular sweeping of the yard, and pumping of below-surface sumps.

The facility has an Industrial Stormwater Permit. Reviewed the reissuance letter for the Industrial Stormwater Permit WAR 125520 from the State of Washington Department of Ecology, which now expires on 12/31/2029.

Reviewed the Industrial Stormwater Monthly Inspection Report for July, which had no specific findings outside of the recommendation to schedule a drain basin clean-up of plant growth, and to schedule the regular vacuuming of the yard.

Reviewed email from Christine Haun of E-Cycle Washington informing Ace Metal Company that the registered status as a transporter with the E-Cycle Washington Electronic Products Recycling Program is active for the period 09/01/2025 to 08/31/2026.

Reviewed email from Christine of E-Cycle Washington informing Ace Metal Company that the registered status for the E-Cycle Wahington electronic product recycling program, which was filed for early, is currently under review as of 08/18/2025 and is current until 09/01/2025.

Reviewed scale calibration dated 07/01/2025 for the outside and inside scales completed by Rays Scale Consulting.

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

The company-wide EHSMS is not certified through a third party and is audited by their consultant and updated, as new procedures are implemented, or as new material is accepted. The EHSMS contains a diligent "Plan, Do, Check" component, which manages change and issues through constant management review. Reviewed the Annual Management Review Meeting minutes dated 02/04/2025. Meeting minutes consisted of:

- Staffing,
- Fixed Assets and repairs and maintenance,
- Finance.

#### **Findings:**

**NC 01 – The brake pad on the forklift is worn to the metal, creating a safety hazard.**

**NC 02 – The outfeed side of the wire striper lacks guarding**

**NC 03 – The site is tearing down CRTs to tube level, and fans blow in the operator's direction. IH sampling has not been done to ensure employees are not exposed to elevated levels of metal-containing dust.**

**NC 04 – There are 5-gallon buckets that contain coolants from projection tubes without labels.**

**OFI 01 – The baler operator is wearing DbA reduction ratio earplugs of 22 without IH documentation, if this is enough to mitigate hearing loss risks.**

**OFI 02 – There is a tank of compressed air that is not secured. The tank gauge is broken.**

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

Records are managed well, as noted during the audit, and material downstream dispositions to the first tier using shipping paperwork and final destinations are documented on the MOC chart.

Reviewed the following BOLs:

- Li-ion Batteries and lamps to [REDACTED] on 10/15/2024 for 131 lbs., and the subsequent shipment documents to [REDACTED].
- CRT Glass to [REDACTED] on 06/17/2025 for 37,571 lbs., and the subsequent shipment to [REDACTED] in Des Moines,
- Plastics to [REDACTED] on 08/18/2025 for 40,000 lbs., and the subsequent shipment to [REDACTED],
- LCDs to [REDACTED] on 08/19/2025 for 26,000 lbs., and the subsequent shipment to [REDACTED].

Reviewed the Downstream Vendor Vetting Files for:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED],
- [REDACTED]

Ace Metals uses QuickBooks to provide the data necessary for their mass balance sheet and their Solid Waste and Biosolids Facility Annual Reports. Auditor reviewed the 2024 Mass Balance and Solid Waste Biosolids Facility Annual Reports.

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

Ace Metal Co. has an EPA /State ID number WAH000058380 for being a Large Quantity Handler of Universal Waste and accepts all types of electronic waste. Material is received and logged into the WMMFA sign-in sheet for CRTs, TVs, monitors, computers and laptops.

Computers and CRT devices are dismantled onsite; CRT tubes, circuit boards, and batteries are shipped to approved DSVs. Hard drives 1TB or more are sent to approved DSVs for data sanitization and resale. Laptops and flat panel display devices are packaged and shipped to approved DSVs.

The facility uses a 28-foot box truck that is owned for picking up shipments from customers. Reviewed the Driver's Vehicle Inspection Reports which are completed daily.

Reviewed Quarterly Facility Inspection Checklist dated 07/25/2025, which identified that a yard cleaning should be done.

All employees are trained during New Hire and Annual Refresher Training which includes Management of CRTs, Universal Waste Devices, Lead Spill, and Mercury Spill Clean-up and Exposure Training. Handling batteries, General UW Labeling and Signage, PPE, Machine Guarding, and Forklift Safety.

Management meetings and safety committee meetings are conducted monthly. Reviewed management meetings minutes dated 02/04/2025 and All Hands Safety meetings minutes dated 08/19/2025/

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

The auditor observed most Materials of Concern (MOC) being managed in accordance with standards. A MOC flow chart is attached. The auditor verified that all downstream vendors for MOC's manage material per the WA State DOE Standards. Ace notifies the WA State DOE of vendor changes for all MOC's.

MOC chart for 2025 is attached for review.

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

Ace Metals manages materials and the facility to Washington State and OSHA standards as observed during the site visit. The auditor observed dismantling and to the highest marketable levels.

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

Ace removes hard drives that are 1TB for reuse. They are sold to an approved DSV for data sanitization and resale.

**Finding:**

**NC 05 – Below cut line data bearing devices when removed from devices are placed into a gaylord until shipped to a vetted DSV, who then ships to another DSV for destruction. The gaylord is unsecured from pilferage and positioned next to an open roll-up door.**

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

Facility waste management follows state and federal guidelines. No Materials of Concern go to non-HW landfills or incineration. Site waste is managed and separated to minimize material going to landfill and nothing from the recycling process goes to the landfill.

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

Not applicable, facility does not repair/refurbish units.

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

Ace accepts deliveries directly from customers, or they use their own box truck for pick-ups. They have a backup truck if the box truck needs repair. Reviewed the annual vehicle inspection report from Auto Truck Service of Everett dated 07/03/2025.

Reviewed email from Christine Haun of E-Cycle Washington informing Ace Metal Company that the registered status as a transporter with the E-Cycle Washington Electronic Products Recycling Program for the period 09/01/2025 to 08/31/2026 is current and active.

Ace Metals uses one third-party transporter for outbound materials. Reviewed the Vendor Audit file for Ryan Transportation last reviewed 03/08/2025.

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

Ace does not use prison labor.

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

Ace allows WA State DOE and City of Mukilteo full record and site access.

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

Ace agrees to notify the WA DOE within 30 days if it receives a Notice of Violation at the facility. The facility has listed this requirement in their Legal and Other requirements to manage.

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

As part of the audit process, the auditor reviewed Ace's comprehensive audit criteria for downstream vendor audits and sampled some of their audit packages, which include permits, Bills of Lading, confirmation that the material processing meets the WMMFA requirements and worker health and safety protections. Processing technologies and material dispositions are listed in the MOC chart attached to this report. While onsite, the auditor also reviewed 12 months of Bills of Lading for all Materials of Concern against audit folders and the list of approved downstream vendors for accuracy.

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

Ace Metals does not directly export any materials. Circuit boards are sent to approved DSVs and then are exported to smelters in Japan.

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

Ace maintains adequate insurance to cover their employees, operations, and pollution liability. The facility holds the following insurances:

Commercial General Liability Each Occurrence Limit: \$2,000,000 expires 05/22/2026

Third Party Pollution Liability Each Pollution Condition Limit: \$1,000,000 expires 05/22/2026

Business Auto Coverage Limit \$1,000,000 expires 12/15/2025.

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

Reviewed Closure Plan dated 02/02/2023. The Closure Plan estimated cost of closure is \$21,000.

Ace Metal Company and its sole owner, Mr. James Yoo, provide all financial guarantees of closure and compliance with the Closure Plan. The current market value of the property is more than \$2,000,000.

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

Vivent, a third-party alarm company, monitors the doors, motion, and electrical failure 24/7. There are 13 cameras with recordings stored for 1 month. Lorex monitors the cameras, and the facility has access to them on the owner's phone.

**Findings**

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

**Section 3 - Environmental, Health, and Safety Management System EHSMS**

**NC 01 – The brake pad on the forklift is worn to the metal, creating a safety hazard.**

**NC 02 – The outfeed side of the wire stripper lacks guarding**

**NC 03 – The site is tearing down CRTs to tube level, and fans blow in the operator’s direction. IH sampling has not been done to ensure employees are not exposed to elevated levels of metal-containing dust.**

**NC 04 – There are 5-gallon buckets that contain coolants from projection tubes without labels.**

**Section 8 – Reuse**

**NC 05 – Below cut line data bearing devices when removed from devices are placed into a gaylord until shipped to a vetted DSV, who then ships to another DSV for destruction. The gaylord is unsecured from pilferage and positioned next to an open roll-up door.**

**Section 3 - Environmental, Health, and Safety Management System EHSMS**

**OFI 01 – The baler operator is wearing DbA reduction ratio earplugs of 22 without IH documentation, if this is enough to mitigate hearing loss risks.**

**OFI 02 – Noted tank of compressed air not secured. The tank gauge is broken.**

**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.