



January 11, 2018

Christine Haun  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

Dear Ms. Haun:

The purpose of this letter is to provide the Washington State Department of Ecology Electronic Products Recycling Program updated information about the third party environmental health and safety management system audits conducted at ECS Refining, Stockton in the past year. The certifications held by ECS Refining (e-Stewards, ISO14001, OHSAS 18001, and R2) mirror the requirements of the “Environmentally Sound Management and Performance Standards for Direct Processors”. This letter and audit report provides evidence that the manner ECS Refining uses to meet the performance standards has been audited by a third party; specifically, the surveillance audit was most recently conducted in July 2017 by Orion Registrars.

ECS Refining is registered to the e-Stewards Standard for Responsible Recycling and Reuse of Electronic Equipment and to the Responsible Recycling (R2) standard. Registration to the e-Stewards standard also includes registration to the ISO14001 environmental management standard. The initial registration audit, conducted by QMI SAI Global, occurred in August 2011 and ECS Refining has had surveillance audits by QMI SAI Global or Orion Registrars at least annually since then. A copy of the audit report for the July 2017 audit is included as an attachment to this letter for your records. This letter details how the e-Steward standard correlates with the nineteen Washington State performance standards as evidence that the third party audits conducted by QMI SAI Global meet the requirements of your program registration for recyclers.

### ***1. Responsible Management Priorities***

An expectation that a company engages in a documented continuous improvement program is integral to the ISO14001 and OHSAS 18001 systems and the e-Steward standard (Section 4 of the e-Steward standard calls for a company to “...establish, implement, maintain and continually improve an environmental management system...” In addition, a company must also include its health and safety management system in its continual improvement program.)

### ***2. Legal Requirements***

Section 4.3.2 of the e-Steward Standard requires companies to establish a system for evaluating its relevant legal obligations. Section 4.3.2.1 requires a company to obtain the required permits for its operations. Section 4.3.2.2 requires companies to only export hazardous e-waste in accordance with national and international law. Section 4.3.2.3 requires an e-Steward

2222 S. Sinclair Avenue  
Stockton, CA 95215

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to comply with any laws pertaining to data security that may be in place in the jurisdiction in which it operates.

### ***3. Environmental, Health, and Safety Management Systems***

The ISO14001 and e-Steward standard contain the requirement to have a documented EHSMS that is implemented according to the “Plan, Do, Check, Act” principles. The e-Steward standard includes requirements to manage health and safety in the same manner that the ISO14001 standard requires management of environmental risks. Therefore, ECS Refining has set both environmental and health and safety objectives, and monitors progress toward these goals. The e-Steward standard requires extensive due diligence on downstream vendors used for the various materials removed from electronic waste.

### ***4. Recordkeeping***

As a certified e-Steward, ECS Refining is required to have a documented inventory tracking system and to maintain files of incoming and outgoing materials. This information must be provided to customers upon request. The e-Steward standard requires records to be maintained for a minimum of five years.

### ***5. On-site Requirements***

As part of ECS Refining’s environmental policy that has been established in accordance with e-Steward requirements, the company maximizes recycling of materials. As part of the monitoring and measurement provisions of the e-Steward standard, a certified scale is used to weigh incoming and outgoing materials. The e-Steward standard requires a facility to maintain operational control (Section 4.4.6) which includes proper storage of materials. In addition, a facility must have appropriate emergency plans and procedures (Section 4.4.7). The e-Steward program requires recyclers to develop a comprehensive site hazard analysis and to conduct industrial hygiene monitoring and to evaluate the noise and ergonomic hazards posed by the operation (Section 4.4.6.1 “Health and Safety in the Workplace”). E-Stewards are required to implement a comprehensive health and safety training program (Section 4.4.2.1).

### ***6. Materials of Concern***

The e-Steward standard identifies as ‘hazardous e-waste’ all printed circuit boards, batteries, fluorescent tubes and other mercury devices, and cathode ray tubes (Section 3, Definitions). Problematic materials are defined as ink/toner, plastics with brominated flame retardants, and ethylene glycol. The section entitled “Managing Hazardous e-Waste and Problematic Components and Materials” (Section 4.4.6.4) governs the way these materials must be recycled/managed, and specifies the due diligence necessary on the downstream vendors. In addition, export restrictions are in place on these materials in accordance with the Basel Convention on the Transboundary Movement of Wastes.

### ***7. Recycling***

The e-Steward standard requires facilities to remove all materials of concern prior to shredding [Section 4.4.6.4(a)].

### ***8. Reuse***

ECS Refining only releases electronic waste for possible to reuse to a solely owned subsidiary, ECS Refining Asset Management Solutions. Material is only diverted for reuse if allowed by the customer's contract with ECS Refining. Any scrap generated by AMS must be returned as stipulated by contract to ECS Refining for recycling. The e-Stewards standard only allows reuse of equipment tested to be fully functional (Section 4.4.6.2 Reuse and Refurbishment of Electronic Equipment). This section of the standard also requires recyclers to prove with shipping records the legitimacy of the sale, and to package materials securely. The AMS division is co-located with the end of life recycling division and maintains the same certifications.

### ***9. Disposal of Residuals***

Section 4.4.6.6 "Materials Recovery and Final Disposition" mandates that an e-Steward manage hazardous e-waste and problematic materials in "...licensed and permitted facilities using technologies that minimize releases, and are not permitted to enter solid waste landfills or incinerators for Final Disposal." This section further outlines how an e-Steward must manage all elements derived from electronic waste, and is in accordance with the Washington State Performance Standards.

### ***10. Refurbishment***

ECS Refining does not directly refurbish electronic waste, but contracts this to its Asset Management Solutions division. ECS Refining, through contract, has imposed e-Steward standards for refurbishment upon AMS and requires material tracking, verified shipment records, and legitimate end markets. All scrap AMS generates must be returned to ECS Refining for processing.

### ***11. Transport***

ECS Refining has written policies and procedures in place to govern transport of materials. These procedures were audited as part of the Orion Registrar audit. The element of the e-Stewards standard that enforces the requirement to be in compliance with applicable transportation laws is Section 4.3.2 Legal and Other Requirements.

### ***12. Prison Labor***

The e-Stewards standard does not allow use of prison labor and requires this to be included in a company's environmental policy (Section 4.2).

### ***13. Facility Access***

The e-Stewards standard requires companies to make their site and records available for audit by customers, and to only use downstream vendors that allow 'scheduled and unscheduled audits' of their operations (Section 4.4.6.5).

### ***14. Notification of Penalties and Violations***

There is no direct requirement in the e-Stewards standard that aligns with this performance standard; however, ECS Refining has agreed to abide by this requirement to notify the Washington State Department of Ecology within thirty days of any violations received.

***15. Due Diligence Downstream***

The e-Stewards standard imposes requirements on e-Stewards to ensure that downstream vendors conform to the elements of the e-Steward standard in their management of materials, recordkeeping, and control of their downstream vendors (Section 4.4.6.5 “Accountability for Downstream Recycling Chain”).

***16. Exporting***

The e-Stewards standard does not allow shipment of hazardous e-waste (analogous to Washington’s Materials of Concern) to non-OECD countries (Section 4.4.6.7 “Exportation of Hazardous Electronic Waste”).

***17. Insurance***

The e-Steward standard mandates that a company carry insurance to cover risks and liabilities of its operation, including liability for data destruction and environmental risks (Section 4.4.8 “Insurance Requirements”).

***18. Closure Plan and Financial Responsibility***

The e-Stewards standard requires that a facility have a closure plan (Section 4.4.6.8 “Closure Plan”) and a closure cost fund. In addition, this is a requirement of the State of California and of the R2 standard, and ECS Refining Stockton has a funded closure plan in place.

***19. Facility Security***

The current version of the e-Steward standard addresses data security (Section 4.4.6.3 “Data Security”) and requires that the facility protect equipment from theft or loss. ECS Refining Stockton has a fully fenced perimeter, and access to the site is controlled at all times by a security guard. There are other security measures in place, including surveillance cameras and an employee, visitor and contractor badge identification system.

I hope this letter of explanation, along with the third party audit conducted by Orion Registrars, have illustrated how ECS Refining conforms to the Washington State Preferred Performance Standards. I have also included a copy of our List of Downstream Recyclers for Materials of Concern and our certificates. If you have any questions or concerns, please contact me at (559) 301-0281.

Sincerely,

Beverly Pester Kennedy  
Director, Environmental Health and Safety

# Audit Report



## Company Audited and Audit Information

**Company:** ECS Refining-Stockton, CA (HQ)

**Audit ID:**7600

**Management Representative:**Jeanne Shackelford

**Audit Dates:** 10.50 days  
07/24/2017-07/29/2017

**Address:**2222 S. Sinclair, Stockton, California 95215 USA

**Type of Audit:**RC

**Phone:**408-200-7076

**Standards Audited:**e-Stewards:2.0, ISO 14001:2004, OHSAS 18001:2007, R2:2013

**E-mail:**jshackelford@ecsrefining.com

**Audit Structure:**Single Site (or treated as Single Site) for Recertification; Multi-site, site sampling structure: 2018 sites not visited planned for June, 2018 audit visits.

**Web page:**www.ecsrefining.com

**Number of Personnel:**230

**Location of Audit (if not above address):** MPO certificate requested for same address under name: Asset Management Solutions (always audited with HQ)

**Number of Shifts:** 2

## Company Information Changes

The information detailed above was reviewed by the Audit Team. The Audit Team concluded that there were changes that affect the management system of the company since the last audit activity was accomplished.

The changes were Representative for all ECS sites:

Beverly Pester Kennedy

Office: 209.774.5000, e-mail: bkennedy@ecsrefining.com

POC California: Mr. Jeff Bell

Office: 972 551 7830; e-mail: jbell@ecsrefining.com

POC AMS: Mr. Ken Taggart

e-mail: ktaggart@ecsrefining.com

POC Texas: Anita Coker;

Office: 972.551.7837; e-mail: acokere@ecsrefining.com

## Orion Audit Personnel

**Audit Team Member(s):** David Koepper (Team Member), Francisco Vazquez Torres Jr. (Team Leader)

**Other:** N/A

## Audit Purpose and Audit Report

This audit evaluated the company for conformance to applicable standards identified above to confirm that the company has met the applicable requirements of the standard(s) and has effectively implemented the applicable requirements of the standard(s).

# Audit Report



The audit was performed in accordance with the requirements of Orion Registrar, Inc. procedures which implement audit requirements of ISO 17021-1 or ISO 17065 and other normative requirements. A management system audit is based on verification of a sample of available information. Thus there is an element of uncertainty reflected in the audit nonconformities. If non-conformities were not identified, this does not mean that they may not exist in audited or other areas.

In addition to the information documented in this report, Orion Registrar maintains files that contain objective evidence collected during the audit and other supporting information concerning your certification. As part of the legal agreement with Orion Registrar, it is necessary to inform Orion Registrar of any major change(s) including management system; ownership; key managerial decision-making or technical staff; introduction of new product/processes; employee numbers; contract address or sites; scope of operations under the certified management system; or other major changes. Please notify Orion Registrar within ten (10) working days by updating the data in the Orion Client Portal or by email to Orion Scheduling.

This report is subject to independent review and approval. If changes are required to this report, a new report will be issued which will supersede this report.

The contents of this Report, including any notes and checklists completed during the Audit are confidential, and will not be disclosed to any third party without the written consent of the customer, except as required by the appropriate authorities identified in the Orion Application for Certification Services. The ownership of this Audit Report is Orion Registrar, Inc.

## Audit Objectives, Scope, and Criteria

The audit objectives for this audit are:

- a) Determination of the conformity of the management system, or parts of it, with audit criteria.
- b) Determination of the ability of the management system to ensure the management system meets applicable statutory, regulatory and contractual requirements.
- c) Determination of the effectiveness of the management system to ensure that you can reasonably expect to accomplish its specified objectives.
- d) As applicable, identification of areas for potential improvement of the management system.

The audit scope is defined in the Audit Plan and Schedule. The specific boundaries of the audit such as physical locations, organizational units, activities, and processes to be audited are detailed in the Audit Plan and Schedule.

Standard(s): e-Stewards:2.0, ISO 14001:2004, OHSAS 18001:2007, R2:2013

Exclusion(s) or Non Applicables to Standard(s): [None]

The audit was conducted in accordance with the above standards and applicable exclusions.

The specific processes audited are documented in the Audit Plan and Schedule. Specific client documents reviewed during the audit are documented in the appropriate Orion objective evidence documents.

## Certification Scope

**Certification Scope: Electronic Waste Recycling; Asset Management; Testing and Resale of Electronic Equipment.**

The audit team reviewed the Certification Scope and the applicable exclusions for the company with respect to the type of activities, products, services, and location(s). The conclusion of the audit team was that the certification scope and applicable exclusions were proper for the company in relation to the company's certification scope.

# Audit Report

## Audit Plan

The Audit Plan and Schedule for this audit is contained in Attachment 1. The Audit Plan and Schedule contains the audit scope which identifies the extent and boundaries of the audit, such as physical locations, organizational units, activities and processes to be audited. The Audit was conducted in accordance with the Audit Plan and Schedule.

## Conductance of the Audit

An Opening and Closing Meeting was accomplished using the Orion Opening & Closing Meeting Agenda. Attendance was taken at the meeting and the attendance sheet is contained in Attachment 2.

Additional information identified at this meeting except for the Audit Plan was not identified

The audit team conducted a process-based audit focusing on significant aspects, risks, objectives. The audit methods used were interviews, observation of activities and review of documentation and records. The audit team has examined and verified that the structure, policies, processes, procedures, records and related documents are relevant to the management system and the audit scope. The objective evidence that the Audit Team documented is contained in applicable auditor notes or Process Audit Worksheets (PAWS) that are maintained by Orion Registrar. The auditing is based on a sampling process of the available information. Auditor recommendations are subject to an independent review prior to a decision concerning the original certification or recertification. The auditor did review all the standards and clauses documented in the Audit Plan and Schedule.

Inconsistencies between policy, objectives and targets (consistent with scope of the certification) and their results were not identified. Evidence was found to demonstrate that the management system has the capability to consistently meet the objectives of the standard.

## Multiple Sites

This audit involved sampling of multiple sites which was conducted in accordance with the requirements of IAF Mandatory Document 1, Certification of Multiple Sites Based on Sampling. The Audit Team reviewed the configuration of the sites identified in previous sections of this report.

### Central Office

The Central Office or the entity responsible for the conductance of the Management System Program was audited and verified the following concerning the responsibilities and duties of the Central Office:

- Proper legal or contractual link with the other locations were implemented so that the proper authority and resources were implemented to assure the compliance of the management system.
- Proper authority and resources have been provided to implement the Corporate Management System.
- The Corporate Management System is responsible for the Management System documentation and changes.
- Management Review, Internal Audits, Corrective Action were implemented for each site.
- Management System controls, procedures, work instructions were similar between the sites.
- Nonconformance discovered at one site have been verified at all sites through either the Internal Audit program or through External Audit.
- The Management System was documented and implemented in accordance with the applicable Management System(s) requirements.

The Central Office has implemented all the requirements listed above.

### Site

# Audit Report

For this site, the Audit Team audited and verified:

- Corporate requirements, processes, and procedures were implemented at the site.
- Corporate controls were implemented.
- The Management System was documented and implemented in accordance with the applicable Management System(s) requirements.

This specific site has implemented all the requirements listed above.

## Conclusion

The Audit Team has determined that the IAF MD-1 requirements have been implemented. In addition the Audit Team has no recommendation for specific sites to be audited at the next surveillance.

## Specific Recertification Requirements Audited

The Audit Team reviewed all the applicable management systems standards for the client.

In preparation for the audit the Audit Team reviewed the previous surveillance reports in the current certification cycle for trends and determination of effectiveness in accordance with the criteria contained in this report. There were no trends identified.

The effectiveness of the overall management system for the current certification cycle was determined to have an effectiveness rating of 4.

The Audit Team also reviewed the use of certification status and scope in marketing, advertising and other documents including the use of the Certification Mark as applicable. The certification claims were accurate and in accordance with Orion guidance.

## Determination of Effectiveness

The Audit Team determined the effectiveness of Internal Audits, Management Review, and the overall effectiveness of the Management System. The objective evidence for the decision is contained in the applicable Process Audit Worksheet (PAW(s)). The criteria to determine the effectiveness is:

Determination of Process Effectiveness Evaluation Method					
Identification/Documentation of Requirements	Effectiveness Level				
	<b>Exceeds</b> All requirements identified plus additional requirements documented	3	4	4	5
	<b>Fully Documented</b> > 95% requirements documented	2	3	4	5
	<b>Partial Documented</b> > 75% documented but < 95% requirements	1	2	3	
	<b>Not Documented</b> <75% Documented	1	1		
		<b>Effectively Not Implemented</b> Appropriate actions is not taken, < 75 of requirements not implemented	<b>Partial Implementation</b> Appropriate actions is being taken, > 75% implemented but not 95% implemented	<b>Full Implementation</b> > 95% implemented	<b>Exceeds</b> All requirements implemented, plus additional requirements implemented
<b>Effectiveness of the implementation (expected outcomes, planned results, and capability to meet requirements)</b>					



# Audit Report



## Effectiveness of the Internal Audit and Management Review

The Internal Audit effectiveness was determined by using the criteria list above. The Internal Audit was judged to have the effectiveness level of 5. The summary of the objective evidence used to determine the effectiveness was (please list):

- ECS STK - AMS Internal Audit report 7/2017
- Corrective action Log

The effectiveness of the Management Review was also determined by using the criteria list above. The Management Review was judged to have the effectiveness level of 4. The summary of the objective evidence used to determine the effectiveness was (please list):

- ECS performs a corporate Management review
- Reviewed the Agenda/Minutes for Management Review Meetings; dated 8/8/16

# Audit Report

## Audit Nonconformances

### Summary of Nonconformance's Issued

- 6 Minor Nonconformities were identified.
- 0 Major Nonconformities were identified.

The Implemented Correction, Cause, and Corrective Action plan is due 30 calendar days from the date the NCR was written. There may be shorter day requirements for standards such as TL9000 and AS.

Corrective Action due dates for implementation and on-site verification/closure:

- Minors-next regularly scheduled audit
- Majors
  - Stage 2 Audit-no deadline but certification cannot proceed until closure\*. However if the NCR is not closed\* in six (6) months, a new Stage 2 Audit is required to be conducted before certification is granted.
  - Transfer Audit-no deadline but certification cannot proceed until closure\*.
  - Surveillance Audit-closure\* is due within 120 calendar days.
  - Recertification Audit- no deadline but certification cannot proceed until closure\*. However if the NCR is not closed\* in six (6) months, a new Stage 2 Audit is required to be conducted before certification is granted.
  - For TL 9000, acceptance of evidence of implementation of the corrective action plan is not to exceed 90 days from the date of the final audit report.

\*Closure means that corrective and corrective action have been effectively implemented and verified by the Orion Auditor.

The status of previous nonconformance's from the past audit activities were closed.

## Opportunities for Improvements

The current EHS Manual and associated documentation describes the way ECS meets the requirements of the standards, however the reference to the specific documents needed to comply with each section could be improved.

Written agreement with overseas end processors (edited to remove name) could be improved in the verbiage to address the e-stewards requirements in SI. 7.

Periodical compliance evaluation procedure could be improved with regards the periodicity required and ensuring the requirements of H&S are covered.

Consider reviewing the estimates of hazardous materials inventory that will have been held on site at any one time (based upon the active life of the facility) for the closure cost calculations.

The Contractor's program could be improved on the process to inform contractors' employees about the H&S risks.

Consider improving the details on competence needed for auditor conducting the internal & external audits for ECS.

The process to provide evidence of the maintenance of 5 years of shipping records could be improved by providing inventory listings of records retained off site that listed details about the records such as vendor names, dates and record types.

The process to identify transportation companies used to transport materials offsite could be improved by capturing detailed information, such as DOT ID and Name, about transporters that were selected by downstream customers.

# Audit Report

The take back warranty process could be improved by specifying in the process that restocking charges only applied to functional equipment that met the advertised specifications for that equipment.

The process of maintaining records to identify key functions tested for unusual or low volume electronic equipment could be improved by recording the results of tests conducted on the units in addition to listing some of the results on the sales order or in photos on outlet screens.

## Management System(s) Strengths

During the interviews to employees to swing shift noted very good awareness about the EHS Policy and Injury prevention.

A very good system for tracking material throughput was found for both, AMS and ECS material.

Good internal audit was conducted in 2017 for the site.

The 5S (3S) process and the measures associated with it have resulted in a continuous housekeeping process and orderly storage of materials.

The daily tail gate meetings were demonstrated during employee interviews to be effective in allowing employees to feel comfortable making suggestions and in having two way communication.

The daily inspection processes and the inclusion of findings in the maintenance work order process demonstrates a commitment to safe equipment management and downtime reduction.

Emergency preparedness include reference to work instructions specific for emergencies such as spills, CRT breakage clean up.

## Overall Effectiveness of Company's Management System

The capability of the Management System to meet applicable requirements, expected outcomes, effectiveness management system in achieving client's objectives and overall effectiveness was determined by using the criteria list in the Effectiveness of the Process Review Section of the Report. The Management System capability and effectiveness was judged to have the effectiveness level of 4. The summary of the objective evidence used to determine the effectiveness was:

- Management Review
- Internal Audit
- Processes Evaluated in Effectiveness of Process Section of the Report
- Aspects / Impacts and Risk Register
- Risk Register - Environmental hazards
- Legal and Other Requirements procedures SP-2
- the SP-19 Evaluation of Compliance
- Site Closure Plan and insurance certificates
- Reviewed Safety committee minutes
- EHS & Security Objectives and Targets and associated charts
- e-Stewards Required Subjects Reviewed
  - • Confirmed a current licensing agreement is in place with e-Stewards
  - • No prohibited export of Hazardous e-Waste, PCMs or equipment going for reuse
  - • Data Security is assured for all customers



## Audit Report

- Workers are systematically protected from toxic exposures, illness, and injury, and housekeeping and Industrial Hygiene practices minimize migration and take-home exposures
- Safe practices are defined and followed for handling Hazardous Electronic Equipment
- Hazardous e-Waste (including untested equipment and components destined for refurbishment) are identified and followed to acceptable Final Disposition
- Material balance accounting, as calculated by the organization, are verified and compared to a sampling of corresponding downstream Shipping Records.
- Verified that the organization has reported the required performance data (9.1.8) to designated data repository
- 
- Required R2 Subjects Reviewed:
  - Focus Material properly shipped
  - Non-functioning material properly classified and properly sold
  - Current licensing agreement with SERI in place
  - Facility Closure plan is current
  - Facility scope is proper
- Reviewed R2 Allowances and "no Allowances are applicable" is correct.
- 

### Unresolved Items and Significant Issues Impacting the Audit Program

There were no unresolved item(s).

There were no significant issues affecting the audit program.

### Additional Auditor Comments (Optional)

There were additional auditor comments.

The additional auditor comments are During the audit followed up on an open issue reported in Santa Clara re-certification audit about the eligibility for the e-stewards certification on the operation located in Arkansas. Communication with BAN was exchanged and the ECS Refining Corporate Structure was provided; it was determined ECS does not have control of the material that is processed and the current site is not eligible, at this time, for this requirement of e-stewards.

### Conclusion

Therefore the Audit Team recommends that, based on the results of this audit which evaluated the system's demonstrated capability to meet applicable requirements and effectiveness and with the provision that the NCRs will be successfully resolved, the Management System certification be:

- Original Certification 
  Continued Certification 
  Certification Transfer 
  Scope Change/Standard Upgrade  
 Suspended until satisfactory corrective action is completed 
  Withdrawn

Lead Auditor: Francisco Vazquez Torres

Date: 7/28/2017

#### Orion Technical Review (if applicable)

Result of Technical Review has concluded that the Management System certification is:

- Original Certification 
  Continued Certification 
  Certification Transfer 
  Scope Change/Standard Upgrade  
 Suspended until satisfactory corrective action is completed 
  Withdrawn

Technical Reviewer: Karen Mustoe (Administrative Assistant)

Date: 8/7/2017

# Audit Report



## Follow-up Activities

Based upon the result of the audit, follow-up on open NCRs / AOCs is required.

## Next Activity and Focus for Next Audit Activity

The next activity will be Surveillance-Upgrade

Preliminary activity date(s) were discussed.

## Attachments

Attachments

- 1) Audit Plan and Schedule
- 2) Opening & Closing Meeting Attendance
- 3) ECS Refining Corporate Structure and ECS Walmart Overview 7.11.17

# Audit Report



## Distribution

### Distribution:

Company:ECS Refining-Stockton, CA (HQ)

Team Leader:Francisco Vazquez Torres Jr.

Auditor(s): David Koepper (Team Member), Francisco Vazquez Torres Jr. (Team Leader)



**Orion Registrar, Inc.**  
Thorough and Fair Auditing

## Certificate of Certification

*This is to certify the Environmental, Health and Safety Management System of:*

**ECS Refining, LLC**  
2222 S. Sinclair  
Stockton, CA 95215 USA

*Has been assessed by Orion Registrar and found to be in compliance with the following Standard:*

**The e-Stewards Standard for Responsible Recycling and Reuse of Electronic Equipment® Version 2.0:2013**

*The Management System is applicable to:*

**Electronic Waste Recycling; Asset Management;  
Testing and Resale of Electronic Equipment.**

*The Certification period is from*

**August 11, 2017 to September 15, 2018**

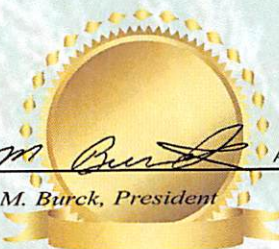
*This certification is subject to the company maintaining its system to the e-Stewards standard for responsible recycling and reuse of electronic equipment®, and applicable exceptions, which will be monitored by Orion.*

Client ID: 2132

Certificate ID: 1009519

Central Function Site - For Additional Site(s) See Appendix



  
*Paul M. Burck* August 18, 2017  
Paul M. Burck, President Date





**Orion Registrar, Inc.**

**Thorough and Fair Auditing**

## **Additional Sites - Appendix**

### **ECS Refining, LLC**

**The e-Stewards Standard for Responsible Recycling  
and Reuse of Electronic Equipment® Version 2.0:2013**

Client ID: 2132

Certificate ID: 1009519

**August 11, 2017 to September 15, 2018**

<b>Location</b>	<b>Address</b>	<b>Scope</b>
Asset Management Solutions (MPO)	1515 Big Town Boulevard Mesquite, TX 75149 USA	Same as Central Function Site
Asset Management Solutions (MPO)	2222 S. Sinclair Stockton, CA 95215 USA	Same as Central Function Site
ECS Refining, LLC	1515 Big Town Boulevard Mesquite, TX 75149 USA	Same as Central Function Site
ECS Refining, LLC	705 Reed Street Santa Clara, CA 95050 USA	Same as Central Function Site





**Orion Registrar, Inc.**  
Thorough and Fair Auditing

## Certificate of Certification

*This is to certify the Environmental Management System of:*

**ECS Refining, LLC**  
2222 S. Sinclair  
Stockton, CA 95215 USA

*Has been assessed by Orion Registrar and found to be in compliance with the following Environmental Management Standard:*

**ISO 14001:2004**

*The Environmental Management System is applicable to:*

**Electronic Waste Recycling; Asset Management;  
Testing and Resale of Electronic Equipment.**

*The Certification period is from*

**August 11, 2017 to September 15, 2018**

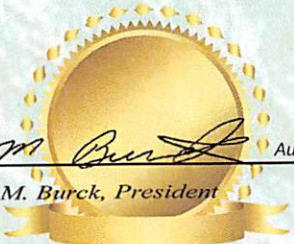
*This certification is subject to the company maintaining its system to the required standard, and applicable exceptions, which will be monitored by Orion.*

Client ID: 2132

Certificate ID: 1009520

Central Function Site - For Additional Site(s) See Appendix



  
*Paul M. Burck* August 18, 2017  
Paul M. Burck, President Date





**Orion Registrar, Inc.**

**Thorough and Fair Auditing**

## **Additional Sites - Appendix**

### **ECS Refining, LLC**

**ISO 14001:2004**

Client ID: 2132

Certificate ID: 1009520

**August 11, 2017 to September 15, 2018**

<b>Location</b>	<b>Address</b>	<b>Scope</b>
Asset Management Solutions (MPO)	1515 Big Town Boulevard Mesquite, TX 75149 USA	Same as Central Function Site
Asset Management Solutions (MPO)	2222 S. Sinclair Stockton, CA 95215 USA	Same as Central Function Site
ECS Refining, LLC	1515 Big Town Boulevard Mesquite, TX 75149 USA	Same as Central Function Site
ECS Refining, LLC	705 Reed Street Santa Clara, CA 95050 USA	Same as Central Function Site



**Orion Registrar, Inc.**  
Thorough and Fair Auditing

## Certificate of Certification

*This is to certify the Occupational Health and Safety Management System of:*

**Asset Management Solutions (MPO)**  
2222 S. Sinclair  
Stockton, CA 95215 USA

*Has been assessed by Orion Registrar and found to be in compliance with the following Occupational Health and Safety Standard:*

**OHSAS 18001:2007**

*The Occupational Health and Safety Management System is applicable to:*

**Electronic Waste Recycling; Asset Management;  
Testing and Resale of Electronic Equipment.**

*The Certification period is from*

**August 11, 2017 to August 22, 2020**

*This certification is subject to the company maintaining its system to the required standard, and applicable exceptions, which will be monitored by Orion.*

Client ID: 2132

Certificate ID: 1009532

See Corporate Certificate ID: 1009521



  
Paul M. Burck, President  
August 18, 2017  
Date



**Orion Registrar, Inc.**  
Thorough and Fair Auditing

## Certificate of Certification

*This is to certify the Environmental, Health and Safety Management System of:*

**Asset Management Solutions (MPO)**  
2222 S. Sinclair  
Stockton, CA 95215 USA

*Has been assessed by Orion Registrar and found to be in compliance with the following Standard:*

**The e-Stewards Standard for Responsible Recycling and Reuse of Electronic Equipment® Version 2.0:2013**

*The Management System is applicable to:*

**Electronic Waste Recycling; Asset Management;  
Testing and Resale of Electronic Equipment.**

*The Certification period is from*

**August 11, 2017 to September 15, 2018**

*This certification is subject to the company maintaining its system to the e-Stewards standard for responsible recycling and reuse of electronic equipment®, and applicable exceptions, which will be monitored by Orion.*

Client ID: 2132

Certificate ID: 1009524

See Corporate Certificate ID: 1009519



  
*Paul M. Burck* August 18, 2017  
Paul M. Burck, President Date





**Orion Registrar, Inc.**

**Thorough and Fair Auditing**

## Certificate of Certification

*This is to certify the Responsible Recycling System of:*

**Asset Management Solutions (MPO)**

**2222 S. Sinclair  
Stockton, CA 95215 USA**

*Has been audited by a certification body that is in conformance with ISO/IEC 17021 requirements and applicable ANAB requirements. The organization is found to be in conformance with all requirements*

**R2:2013**

*The Responsible Recycling System is applicable to:*

**Electronic Waste Recycling; Asset Management;  
Testing and Resale of Electronic Equipment.**

*The Certification period is from*

**August 11, 2017 to August 22, 2020**

*This certification is subject to the company maintaining its system to the required standard, and applicable exceptions, which will be monitored by Orion.*

Client ID: 2132

Certificate ID: 1009535

See Corporate Certificate ID: 1009522

As applied by the R2 Code of Practices including  
No Allowance was applied as defined in the Section VII.



  
*Paul M. Burck, President*      August 18, 2017  
Date





**Orion Registrar, Inc.**  
Thorough and Fair Auditing

## Certificate of Certification

*This is to certify the Environmental Management System of:*

**Asset Management Solutions (MPO)**  
2222 S. Sinclair  
Stockton, CA 95215 USA

*Has been assessed by Orion Registrar and found to be in compliance with the following Environmental Management Standard:*

**ISO 14001:2004**

*The Environmental Management System is applicable to:*

**Electronic Waste Recycling; Asset Management;  
Testing and Resale of Electronic Equipment.**

*The Certification period is from*

**August 11, 2017 to September 15, 2018**


*This certification is subject to the company maintaining its system to the required standard, and applicable exceptions, which will be monitored by Orion.*

Client ID: 2132

Certificate ID: 1009528

See Corporate Certificate ID: 1009520



  
*Paul M. Burck* August 18, 2017  
Paul M. Burck, President Date





**Orion Registrar, Inc.**  
Thorough and Fair Auditing

## Certificate of Certification

*This is to certify the Responsible Recycling System of:*

**ECS Refining, LLC**  
2222 S. Sinclair  
Stockton, CA 95215 USA

*Has been audited by a certification body that is in conformance with ISO/IEC 17021 requirements and applicable ANAB requirements. The organization is found to be in conformance with all requirements*

**R2:2013**

*The Responsible Recycling System is applicable to:*

**Electronic Waste Recycling; Asset Management;  
Testing and Resale of Electronic Equipment.**

*The Certification period is from*

**August 11, 2017 to August 22, 2020**

*This certification is subject to the company maintaining its system to the required standard, and applicable exceptions, which will be monitored by Orion.*

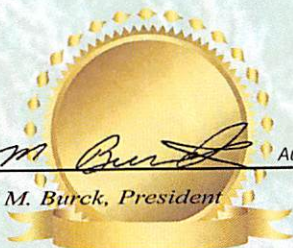
Client ID: 2132

Certificate ID: 1009522

Central Function Site - For Additional Site(s) See Appendix

As applied by the R2 Code of Practices including  
No Allowance was applied as defined in the Section VII.



  
*Paul M. Burck* August 18, 2017  
Paul M. Burck, President Date





**Orion Registrar, Inc.**

**Thorough and Fair Auditing**

## **Additional Sites - Appendix**

### **ECS Refining, LLC**

**R2:2013**

Client ID: 2132

Certificate ID: 1009522

**August 11, 2017 to August 22, 2020**

<b>Location</b>	<b>Address</b>	<b>Scope</b>
Asset Management Solutions (MPO)	1515 Big Town Boulevard Mesquite, TX 75149 USA	Same as Central Function Site
Asset Management Solutions (MPO)	2222 S. Sinclair Stockton, CA 95215 USA	Same as Central Function Site
ECS Refining, LLC	1515 Big Town Boulevard Mesquite, TX 75149 USA	Same as Central Function Site





**Orion Registrar, Inc.**  
Thorough and Fair Auditing

## Certificate of Certification

*This is to certify the Occupational Health and Safety Management System of:*

**ECS Refining, LLC**  
2222 S. Sinclair  
Stockton, CA 95215 USA

*Has been assessed by Orion Registrar and found to be in compliance with the following Occupational Health and Safety Standard:*

**OHSAS 18001:2007**

*The Occupational Health and Safety Management System is applicable to:*

**Electronic Waste Recycling; Asset Management;  
Testing and Resale of Electronic Equipment.**

*The Certification period is from*

**August 11, 2017 to August 22, 2020**


*This certification is subject to the company maintaining its system to the required standard, and applicable exceptions, which will be monitored by Orion.*

Client ID: 2132

Certificate ID: 1009521

Central Function Site - For Additional Site(s) See Appendix



  
*Paul M. Burck* August 18, 2017  
Paul M. Burck, President Date



**Orion Registrar, Inc.**

**Thorough and Fair Auditing**

## **Additional Sites - Appendix**

**ECS Refining, LLC**

**OHSAS 18001:2007**

Client ID: 2132

Certificate ID: 1009521

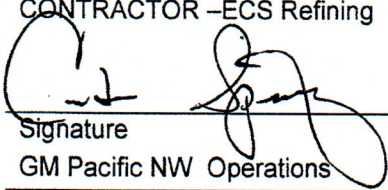
**August 11, 2017 to August 22, 2020**

<b>Location</b>	<b>Address</b>	<b>Scope</b>
Asset Management Solutions (MPO)	1515 Big Town Boulevard Mesquite, TX 75149 USA	Same as Central Function Site
Asset Management Solutions (MPO)	2222 S. Sinclair Stockton, CA 95215 USA	Same as Central Function Site
ECS Refining, LLC	1515 Big Town Boulevard Mesquite, TX 75149 USA	Same as Central Function Site

This Contract shall be subject to the written approval of the AUTHORITY's authorized representative and shall not be binding until so approved. The Contract may be altered, amended, or waived only by a written amendment executed by both parties.

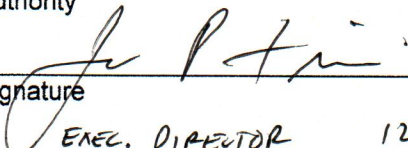
THIS CONTRACT is executed by the persons signing below, who warrant they have the authority to execute the Contract.

CONTRACTOR -ECS Refining

  
\_\_\_\_\_  
Signature  
GM Pacific NW Operations  
\_\_\_\_\_  
Title

11-21-2017  
\_\_\_\_\_  
Date

Washington Materials Management and Financing Authority

  
\_\_\_\_\_  
Signature  
EXEC. DIRECTOR  
\_\_\_\_\_  
Title

12/19/17  
\_\_\_\_\_  
Date