

Vendor Name: Shredmystuff

Other Business Names: Shredder1, USAShred

5522 New Shred Street, Shreddertown, NC 09920

Address:

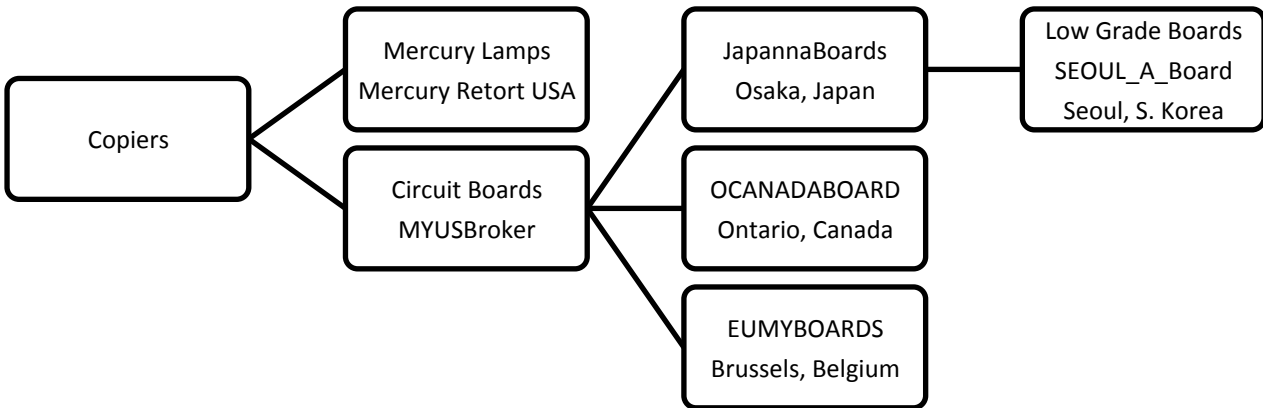
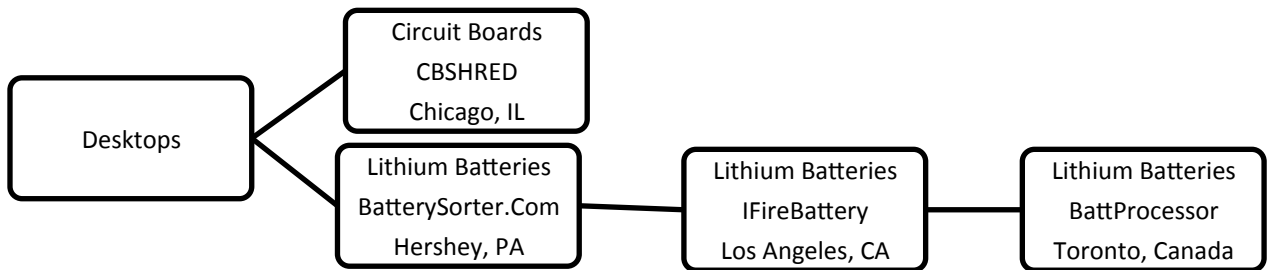
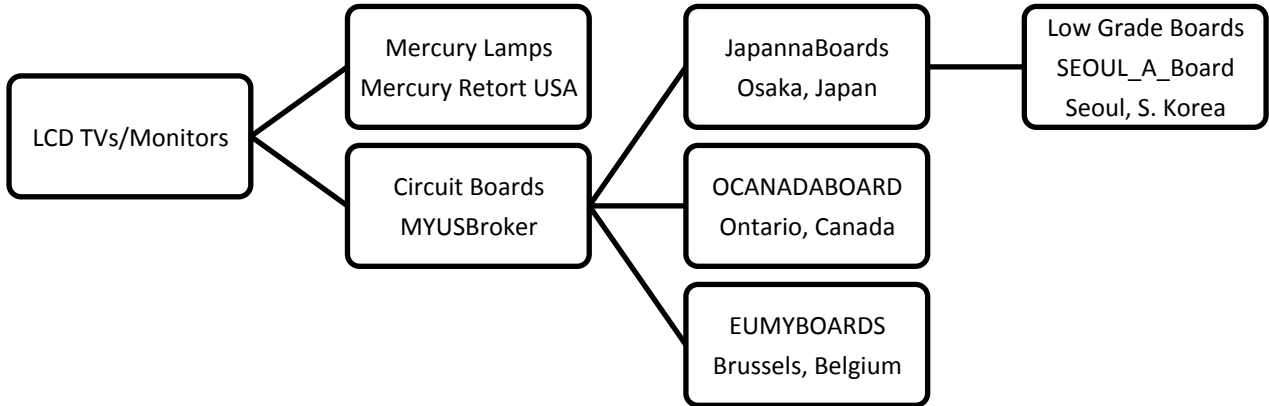
Scope of Products

Document the equipment sent to recyclers and the processing techniques by the downstream vendor. Remove or change equipment types specific to each downstream vendor.

Equipment	Processing Technique
Desktops	Removes battery and shreds. Output is separated by Eddy Currents, magnets, and other technologies.
Laptops	Laptop screens are manually removed and dismantled. Battery is removed. Remainder is shredded.
LCD TV's/Monitors	Manually dismantled to remove mercury bearing lamps
Copiers	Mercury bearing lamps removed. Copier is too large to be shredded. Manually dismantled into small pieces. Pieces are shredded and mechanically separated.

Downstream Focus Materials Recycling Chain (Provision 7)

(Example – copy for each stream of materials. Make a flow diagram following the Focus Materials throughout the recycling chain.)



Import/Export Compliance

Document the products containing Focus Materials that are imported or exported by the downstream vendors in this recycling chain. This shall not include any products Tested and Full Functions/R2 Ready for Reuse or Tested for Key Functions, R2/Ready for Resale under Provision 6.

Product (with FM)	Country	Evidence of Legality
CRT Glass	Mexico	United States 40 CFR 261 requires notice and consent for the export of CRT's for recycling. As evidenced on http://www.epa.gov/osw/hazard/international/crts/recycling.htm this company is approved to export CRTs for recycling through 05/01/2015
Shredded Circuit Boards	Japan	<p>OECD Member Country. United States 40 CFR Part 262 Subpart H does not require notification and consent for OECD Green Listed wastes in transboundary shipments. Shredded circuit boards with batteries and mercury relays removed prior to shredding fall into GC020 of the OECD Decision.</p> <p>OECD Decision – Wastes subject to Green Control Procedure – GC020 Electronic Scrap (e.g. printed circuit boards, electronic components, wire, etc.) and reclaimed electronic components suitable for base and precious metal recovery.</p> <p>Basel Ban Amendment – Circuit boards are exempt under Annex IX List B (B1110)</p>
Shredded Circuit Boards	Canada	<p>OECD Member Country. United States 40 CFR Part 262 Subpart H does not require notification and consent for OECD Green Listed wastes in transboundary shipments. Shredded circuit boards with batteries and mercury relays removed prior to shredding fall into GC020 of the OECD Decision.</p> <p>OECD Decision – Wastes subject to Green Control Procedure – GC020 Electronic Scrap (e.g. printed circuit boards, electronic components, wire, etc.) and reclaimed electronic components suitable for base and precious metal recovery.</p> <p>Basel Ban Amendment – Circuit boards are exempt under Annex IX List B (B1110)</p>
Shredded Circuit Boards	Belgium	<p>OECD Member Country. United States 40 CFR Part 262 Subpart H does not require notification and consent for OECD Green Listed wastes in transboundary shipments. Shredded circuit boards with batteries and mercury relays removed prior to shredding fall into GC020 of the OECD Decision.</p> <p>OECD Decision – Wastes subject to Green Control Procedure – GC020 Electronic Scrap (e.g. printed circuit boards, electronic components, wire, etc.) and reclaimed electronic components suitable for base and precious metal recovery.</p> <p>Basel Ban Amendment – Circuit boards are exempt under Annex IX List B (B1110)</p>

<p>Shredded Circuit Boards</p>	<p>South Korea</p>	<p>OECD Member Country. United States 40 CFR Part 262 Subpart H does not require notification and consent for OECD Green Listed wastes in transboundary shipments. Shredded circuit boards with batteries and mercury relays removed prior to shredding fall into GC020 of the OECD Decision.</p> <p>OECD Decision – Wastes subject to Green Control Procedure – GC020 Electronic Scrap (e.g. printed circuit boards, electronic components, wire, etc.) and reclaimed electronic components suitable for base and precious metal recovery.</p> <p>Basel Ban Amendment – Circuit boards are exempt under Annex IX List B (B1110)</p>
<p>Lithium Batteries</p>	<p>Canada</p>	

Provision 5(e) Requirements

These requirements are documented in R2:2013 Provision 5(e). The cross-referenced provisions are extracted here for all the requirements incorporated in 5(e).

Prov.	Requirement	Verification
5(e)(1)	How are downstream vendor(s) following the Focus Materials Management Plan?	Batteries and mercury lamps are being removed from equipment prior to shredding. No FMs are landfilled or incinerated in this process. Downstream vendor
5(e)(1)	Are FMs removed from equipment prior to shredding?	A sort line is staffed by employees who remove batteries, lamps, and potentially mercury relays from equipment prior to aggregating material on the feedstock pile for the shredder line.
5(e)(1)	Is mercury retorted or processed by other legal methods, not incinerated?	Yes. Mercury lamps are removed from LCD's and BOL dated 05/25/2014 shows shipment to an approved Mercury Retorter.
5(e)(1)	Are circuit boards processed for metals recovery?	Circuit board fraction is removed in the shredder process. Shipping paperwork shows export to approved primary smelter in Japan.
5(e)(1)	Are polychlorinated biphenyls destroyed in legally compliant facilities?	Not applicable – prohibited material in this facility.
5(e)(1)	Verify no FMs are managed for disposal through energy recovery, incineration, or landfill.	All products and residual FM's were accounted for in the process flow and downstream vendors. A review of downstream vendors does not demonstrate areas where these methods are used.
3(a)	Has the recycler developed a legal compliance plan and included it as a section of its EHSMS?	See attached Legal Compliance Plan
3(a)	Does the legal compliance plan include all applicable environmental legal requirements? Examples: International regulations, national regulations, local laws, air pollution control, waste laws, etc.	Legal compliance plan includes analysis of Basel Ban Amendment, CRT Rule, 40 CFR 273 Universal Waste, State Universal Waste Regulations, Storm Water, and Air Regulations. See attached Legal Compliance Plan

Prov.	Requirement	Verification
3(a)	Does the legal compliance plan include all applicable health and safety requirements? Examples: worker safety regulations, fire codes, building codes, etc.	Attached Legal Compliance Plan includes state specific occupational safety and health regulations for powered industrial truck, accident reporting, personal protective equipment, etc.
3(a)	Does the legal compliance plan include data security regulations? Examples include health information protection, financial information, personal identity information, etc. [section (a)]	Legal compliance plan demonstrates a review of data security regulations including HIPAA and GLB. Review shows that no existing customers are applicable to these regulations.
3(a)	Does the legal compliance plan include applicable import and export laws covering shipments of FMs and shipments of untested or non-functioning equipment or components containing FMs? [Yes, Basel Ban Amendment and CRT rule are listed.
3(a)(2)	Does the legal compliance plan cover the legality of exports and imports through all countries?	Yes, all exports are direct to the final destination
3(a)(2)	Does the legal compliance plan include imports/exports by downstream vendors?	Yes, includes Tier 2 exports to Mexico, Canada, Belgium, and Japan
3(a)(2)	Does the recycler have evidence that transit or destination countries were determined prior to shipment by the recycler or downstream vendors?	Yes, see downstream flowchart.
3(a)(2)	Does the recycler have evidence of the legality of imports by each transferring or receiving country for which exports/imports move through? This includes imports/exports by the recycler or any downstream vendor for FM's?	N/A – no transit countries in the downstream flow of focus materials.
3(a)(3)	Does the recycler keep the legal compliance plan current?	Last updated 6/17/2014 to add Mexico regulations for new Tier 2 downstream vendor.
3(a)(3)	Does the recycler identify and implement the steps necessary to comply with each requirement, and document the implementation of these steps?	Reviewed training records and air monitoring reports for permit requirements to ensure implementation.

Prov.	Requirement	Verification
3(a)(3)	Does the recycler periodically <u>audit</u> its compliance with applicable <u>legal</u> requirements?	January 2014 report of legal compliance audit by 3 rd party company was reviewed.
3(a)(3)	Does the recycler have evidence of corrective actions that address issues of non-compliance?	CAR048 was reviewed. This documented the blockage of an emergency exit that was found during a facility inspection. Lines were painted on the floor and employees retrained to prevent future blockage.
4(a)	Does the recycler demonstrate the expertise, knowledge, and technical capability to process each type of equipment, component, and material it accepts in a manner that is legal and protective of worker safety, public health, and the environment?	Mechanical equipment signify a large investment in proper sorting of material. Programs for lead monitoring and pre-processing to remove focus materials are in-place according to the Operations Manual.
4(b)	Does the recycler adhere to good housekeeping standards, including keeping all work and storage areas clean and orderly?	Reviewed 3 facility inspection reports and found only minor issues identified.
4(b)	Is housekeeping for all areas of the facility planned, regularly implemented, and monitored?	According to the Operations Manual, time is allocated on each shift to clean-up before closing.
4(c)	Does the recycler conduct on an ongoing basis (e.g., as new types of materials are processed or new processes are used) a hazards identification and assessment of occupational health and safety and environmental risks that exist or could reasonably be expected to develop at the facility?	Aspects evaluation for environmental impacts and health and safety risks was reviewed. Top ranked risks include lead exposure and fire.
4(c)	Does the hazards identification and assessment include all reasonably foreseeable sources? Examples include emissions, exposure to substances, noise, ergonomic factors, thermal stress, substandard machine guarding, cuts and abrasions, etc.?	Yes, comprehensive review of 38 different criteria. Activities evaluated include routine operations like sort or shred, and non-routine activities like spill response.
4(c)	Is the hazards identification and assessment captured in writing and incorporated as a component of the recycler's EHSMS?	Yes – controlled document EHS02 and EHS03

Prov.	Requirement	Verification
4(d)	Does the recycler have records of managing the EH&S hazards through corrective action	The facility inspection conducted on June 30, 2014 showed several minor problems. These were assigned and tracked on the last page through correction.
4(d)	Does the recycler have evidence demonstrating it has minimized the risks identified?	Company has implemented forklift, pallet jacks, and a Gaylord dumper to minimize ergonomics risks in the movement of material. Employees have also been trained in proper lifting techniques, as well as packaging best practices.
4(d)	Does the recycler implement and prioritize the use of appropriate strategies, including engineering controls, administrative controls, and personal protective equipment?	Machinery is utilized for shredding material, including the capturing of dust emissions. This is supplemented with work instructions and PPE.
4(e)	Does the recycler use monitoring and sampling protocols to continuously manage the risks it has identified?	Recycler conducts monthly facility inspections to verify compliance with OSHA regulations.
4(e)	Does the recycler comply with all applicable permissible exposure limits for sampling and/or monitoring?	Not applicable
4(f)	Does the recycler treat anyone performing activities under its direction, using the same standard of care?	Employees, contractors, and temps receive all are required to meet the same policies and procedures. Records of training show temporary employees in attendance at Hazard Communications training.
4(g)	Has the recycler designated a qualified employee(s) or consultant(s) to coordinate its efforts to promote worker health and safety and environmental protection?	Jose Gonzalez is the employee identified.
4(g)	Is the designated individual(s) identified to all employees and two-way communication encouraged between employees and this individual regarding potential hazards and how best to address them?	Posters in the facility list Mr. Gozalez's phone number and email address for contact.
4(h)	Has the recycler identified probable emergency situations and exceptional circumstances?	Recycler has an emergency action plan which includes procedures for fire, tornado, and floods.

Prov.	Requirement	Verification
4(h)	Has the recycler documented and updated as necessary an emergency plan(s) for the probable emergencies?	EHS05 Emergency Action Plan reviewed
4(h)	Does the emergency plan(s) consider workers, the public, and the environment?	AP includes notification of adjoining tenants and procedures for spill response.
4(h)	Does the recycler periodically test the emergency plans(s)?	Last emergency drill was a tornado drill on 9/4/2014
4(h)	Are occurrences of emergency events, reported to the required authorities?	Contact information for spill reporting to DEP included in the EAP. No reportable incidents have occurred.
5(e)(3)	Does the recycler have a current list of environmental permits?	EHS01 include permits for recycling and storm water.
5(e)(3)	Does the recycler have copies of each environmental permit?	Reviewed permits for recycling and storm water management under the General permit.
5(e)(3)	Are there any exposures requiring a Storm Water permit? (For example, uncovered metal rolloff bin stored outside)	Yes, metals are stored outside in a roll-off dumpster
5(e)(3)	Are there any processes that treat waste water?	No
5(e)(3)	Are there any air permits required?	No

Prov.	Requirement	Verification
5(e)(3)	Are there any permits required for recycling?	Yes, the state requires a permit for recycling electronics.
5(e)(3)	Has notification of waste activity been made to the appropriate authorities? (generator, handler, transporter, etc.)	Yes, company has a permit specifically for recycling from the state DEP.
5(e)(3)	Verify compliance with all EH&S regulatory requirements.	Storm Water testing completed in accordance with the permit on 7/17/2014. Reports from 3/1/2014 reviewed as submitted to the DEP for recycling information.
5(e)(4)	Does the recycler have a downstream due diligence program in line with Provisions 5(e) & (f)?	Company outsources downstream due diligence to be completed by DDD Company.
5(e)(4)	Does the recycler hold all downstream vendors accountable to 5(e) & (f)?	Reviewed DDD reports of downstream vendors for CRT glass and circuit boards. Reports demonstrates conformance to the requirements consistent with Provision 5.
5(e)(5)	If the recycler refurbishes any equipment provided, use the Downstream Refurbisher Checklist to verify conformance.	N/A
7(a)	Recycler tracks equipment received and shipped sufficient to demonstrate that material is not diverted to other vendors.	CycleLution is utilized to track orders and inventory through the process.
7(b)	Did the vendor provide all downstream business names and locations for FMs throughout the recycling chain?	See downstream vendor map attached.
10(a)	Does the recycler have a security program to control access to the facility?	Security program is documented in SEC001. It includes video surveillance, metal detectors, and perimeter security.

Prov.	Requirement	Verification
10(a)	Is the security program appropriate to the type of equipment handled?	Yes, equipment is unidentified when received and processed.
10(a)	Is the security program appropriate to the sensitivity of media containing data?	Yes, no material is restricted by HIPAA or GLZB.
10(a)	Is the security program appropriate to the needs of customers served?	Yes, most residentially or unrestricted business material.
10(b)	Do security controls include transportation from your facility to the downstream recycler?	N/A - no equipment containing data is sent to a downstream vendor. Media is removed in this facility

The above information applies to the minimum requirements of R2:2013 Provision 5(e) for downstream due diligence of a recycler managing Focus Materials. Additional evaluation is recommended. Onsite audits are encouraged.

Additional Notes:

Year 1	
Evaluator:	Bobby Diligent
Attached Evidence:	EHS05 CP01 BOL's
Comments:	
Status:	<input type="checkbox"/> Approved <input type="checkbox"/> Suspended
Date Completed:	
Year 2	
Evaluator:	
Attached Evidence:	
Comments:	
Status:	<input type="checkbox"/> Approved <input type="checkbox"/> Suspended
Date Completed:	
Year 3	
Evaluator:	
Attached Evidence:	
Comments:	
Status:	<input type="checkbox"/> Approved <input type="checkbox"/> Suspended
Date Completed:	