

A. Direct Processors

A.1 Direct Processors

Under the Standard Plan, direct processors will disassemble, dismantle, shred, or otherwise process CEPs to recover, recycle, and otherwise manage materials contained in electronic products. Direct processors handling materials collected by the Authority will ensure that materials are processed in accordance with the minimum and the preferred processing standards established in WAC 173-900-650. Per 70.95N.280 (7) RCW the Authority must accept and utilize any processor meeting the requirements of the chapter, which includes the "Environmentally Sound Management and Performance Standards for Direct Processors" into the standard plan (program). Processors used by the Standard Plan shall provide the Authority, on at least an annual basis, with documentation regarding how they are meeting the applicable minimum and preferred performance standards and submit to annual compliance audits meeting the requirements in WAC 173-900-365. Processors must demonstrate that the unwanted electronic products have been received from registered collectors or transporters and provide other documentation, as may be required by the Authority.

Pursuant to WAC 173-900-600, the Authority will contract with any processor that meets the direct processor performance standards and meets all requirements described in the Authority's Operating Plan or through contractual arrangements with the Authority.

As of January 2014 the Authority has active contracts with the following direct processors to provide processing services for the Standard Plan, (refer to Table H-1 for details). Each of the processors listed have agreed to conform to the "preferred performance standards" as outlined within the "Environmentally Sound Management and Performance Standards for Direct Processors" as prepared by the Department of Ecology.

1. IMS Electronics Recycling Management – Vancouver, WA
2. Total Reclaim – Seattle, WA
3. E-Waste, LLC – Lynnwood, WA
4. Electronics Recyclers International – Auburn, WA
5. EWC Group, Inc. – Seattle, WA
6. Ace Metal Co. – Mukilteo, WA
7. ECS Refining – Santa Clara, CA

Direct processors under contract with the Authority must provide information describing the processes and methods used to recycle CEPs, in accordance with WAC 173-900-320(9). Direct processors must certify in writing that they will comply with the performance standards for direct processors of CEPs. The Authority will compensate direct processors for the reasonable costs associated with processing unwanted CEPs (see also **Section O, Fair Compensation**).

Table A-1. Direct Processor Contracted with Authority for Standard Plan Operations

<i>Processor Name</i>	<i>Location</i>	<i>Contact Persons Info</i>	<i>Phone</i>	<i>CEP Types Processed</i>
<i>IMS Electronics Recycling Management</i>	<i>2401 Saint Francis LN Vancouver, WA 98660</i>	<i>Ed Siegel General Manager eds@imselectronics.com Bill Peterson General Manager BillP@IMSElectronics.com Kathrine Rehder EHS Manager kathrine@imselectronics.com</i>	<i>360-750-8883 858-679-1555</i>	<i>All CEP's</i>
<i>Total Reclaim, Inc.</i>	<i>2200 6th Ave. S. Seattle, WA 98134</i>	<i>Craig Lorch clorch@totalreclaim.com Laurel Lafata EHS Manager LaurelL@totalreclaim.com</i>	<i>206-343-7443 206-343-7443</i>	<i>All CEP's</i>
<i>E-Waste LLC.</i>	<i>12424 Beverly Park Road, Suite A-5 Lynnwood, WA 98036</i>	<i>Sam Kim President sam@e-wastes.com</i>	<i>425-239-4118</i>	<i>All CEP's</i>
<i>Electronics Recyclers International</i>	<i>2302 West Valley Hwy, Suite 100 Auburn, WA 98001</i>	<i>Aaron Blum Co-Founder/Chief Compliance Officer ablum@electronicrecyclers.com</i>	<i>559-442-3968</i>	<i>All CEP's</i>
<i>EWC Group, Inc.</i>	<i>660 S. Othello St. Seattle, WA 98108</i>	<i>Clara Jung Regional Vice President clara@ewastecenter.com</i>	<i>206-767-9950</i>	<i>All CEP's</i>
<i>Ace Metal Co.</i>	<i>11110 Mukilteo Speedway, Suite 202 Mukilteo, WA 98275</i>	<i>James Yoo Owner info@acemetalco.com</i>	<i>425-493-6809</i>	<i>All CEP's</i>
<i>ECS Refining</i>	<i>705 Reed St. Santa Clara, CA 95050</i>	<i>Beverly Kennedy Env. Health & Safety Manager bkennedy@ecsrefining.com</i>	<i>209-774-5000</i>	<i>All CEP's</i>

Processor Compliance

Information about Direct Processors, their environmental audit reports and contracts associated with the Authority can be viewed by clicking on the link below.

[Compliance Audit Reports for Direct Processors of CEPs](#)

A.2 Written Statement of Compliance

On December 26, 2013, **IMS Electronics Recycling** entered into a written contract with the Authority. By its terms, the contract ensures that IMS will comply with the performance standards for direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

On December 23, 2013, **Total Reclaim, Inc.** entered into a written contract with the Authority. By its terms the contract ensures that Total Reclaim Inc. will comply with the performance standards for direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

On December 6, 2013, **E-Waste, LLC** entered into a written contract with the Authority. By its terms the contract ensures that E-Waste, LLC will comply with the performances standards for

direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

On December 20, 2013, **Electronics Recyclers International** entered into a written contract with the Authority. By its terms the contract ensures that ERI will comply with the performances standards for direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

On December 16, 2013, **EWC Group** entered into a written contract with the Authority. By its terms the contract ensures that EWC Group will comply with the performances standards for direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

On December 16, 2013, **Ace Metal Co.** entered into a written contract with the Authority. By its terms the contract ensures that Ace Metal Co. will comply with the performances standards for direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

On December 23, 2013, **ECS Refining** entered into a written contract with the Authority. By its terms the contract ensures that ECS Refining will comply with the performances standards for direct processors in WAC 173-900-650 and any additional processing requirements established by the Authority.

A.3 Preferred Processing Standards

On December 11, 2007, the Authority adopted the Department of Ecology's voluntary preferred processing standards, as specified in *Environmentally Sound Management and Performance Standards for Direct Processors* (Ecology Publication #07-07-046), published in November 2007. To receive "preferred status," a direct processor must comply with Ecology's voluntary preferred processing standards for each of the following categories:

1. Responsible Management Priorities
2. Legal Requirements
3. Environmental, Health, and Safety Management Systems (EHSMS)
4. Recordkeeping
5. On-site Requirements
6. Materials of Concern
7. Recycling
8. Reuse
9. Disposal of Residuals
10. Refurbishment
11. Transport

12. Prison Labor
13. Facility Access
14. Notification of Penalties and Violations
15. Due Diligence Downstream
16. Exporting
17. Insurance
18. Closure Plan and Financial Responsibility
19. Facility Security

For each of the above categories, Ecology has identified a minimum performance standard and a “preferred” performance standard. Minimum standards are set forth in WAC 173-900-650. The preferred standards are additional requirements (exceeding the minimum requirements) that Ecology developed to encourage processing and recycling of CEPs in a manner intended to better protect human health and the environment. Under the Authority’s Standard Plan, all direct processors must meet both the minimum and preferred performance standards. Direct processors must also provide an annual audit documenting compliance with these requirements to receive “preferred status” from Ecology.

A copy of Ecology’s November 2007 preferred performance standards are available at Ecology’s web site at the link: [Environmentally Sound Management and Performance Standards for Direct Processors](#). As of this 2nd submission (August 2013) of the Standard Plan the Authority is not aware of any plans by Ecology to adopt a new set of performance standards for direct processors at this time. Compliance requirements for the Authority as to processors that it utilizes per 70.95N.280 (7) RCW imply the Authority will not unilaterally adopt standards other than those provided within WAC. The Authority will collaborate with Ecology, the citizens of Washington, our currently contracted processors, and other interested parties concerning revised standards if and when deemed necessary.

B. Direct Processor Compliance Audit Reports

B.1 Processor Audit Requirements

To provide services under the Standard Plan, each participating processor must comply with the minimum and preferred performance standards established by the Department of Ecology and any additional requirements established by the Authority. To ensure compliance, each direct processor for the Standard Plan must engage a qualified, independent auditor to perform an annual audit of its processing operations and facilities. An auditor is required to have the appropriate knowledge through professional training, certification, and work experience to evaluate the environmental compliance of the processing facility. The auditor may not be employed by the direct processor other than for the purpose of conducting the compliance audit. Direct processors will obtain approval of proposed compliance auditors from the Department of Ecology.

The Authority will direct the independent auditors to provide their report directly to Ecology, with a copy to the Authority.

This information within the report will include the following items:

- (a) All the performance standards that processors must meet to qualify for work under the Standard Plan (currently, those standards include those identified in Ecology Publication 07-07-046, as the “preferred” performance standards).
- (b) Documentation that the direct processor meets the Plan’s performance standards, including a list of applicable federal, state, and local laws and regulations related to processing activities.
- (c) Documentation of noncompliance with a performance standard: Ecology may excuse a direct processor from compliance with a specific performance standard in WAC 173-900-650 or Ecology Publication 07-07-046 in cases where the national, state, or local laws or rules applicable in a processor’s location and a Plan performance standard conflict. When a conflict exists, the audit report must identify the specific performance standard(s) that is in conflict and provide evidence that the processor is in compliance with the corresponding national, state, or local laws or rules that apply at that location.
- (d) Documents demonstrating the compliance auditor’s accreditation through:
 - (i) ISO Guide 66;
 - (ii) ISO/IEC Standard 17021:2006; or
 - (iii) Another body approved by Ecology.
- (e) Auditor certification of the accuracy of the audit report.

C. Direct Processor Contracts

Processor	Date Contract Signed	Contract Start Date	Contract End Date
IMS Electronics Recycling Management	December 26, 2013	January 2, 2014	December 31, 2014
Total Reclaim, Inc.	December 23, 2013	January 1, 2014	December 31, 2014
E-Waste, LLC	December 6, 2013	January 1, 2014	December 31, 2014
Electronics Recyclers International	December 20, 2013	January 1, 2014	December 31, 2014
EWC Group, Inc.	December 16, 2013	January 1, 2014	December 31, 2014
ECS Refining	December 16, 2013	January 1, 2014	December 31, 2014
Ace Metal Co.	December 23, 2013	January 1, 2014	December 31, 2014