

Guidelines for Auditing Computer or E-scrap Recyclers

Company _____

Address _____

Contact person _____ Title _____

E-mail address _____

Phone(s) _____

Respondent to this query _____

Date _____ Please return within 10 days of receipt.

A. General company information

1. What kind of company are you?

- ? **Broker**
- ? **Refurbisher/Reseller**
- ? **Demanufacturer**

2. Please provide a general description of your business and/or a qualifications statement.

- ? Number of employees
- ? Years in business and ownership history
- ? Facility site information and plant size
- ? Summary of operations and services offered
- ? What else should we know? _____

3. Do you process non-saleable equipment and components by demanufacturing or shredding?

If not, are nonsaleable components outsourced or exported? ? **Yes** ? **No**

If yes, which countries are your primary markets for scrap?

What process(es) does your downstream vendor(s) employ? _____

Can your downstream vendors document their procedures to your satisfaction?

? **Yes** ? **No**

4. What type of products do you accept?

Computers and peripherals

- ? Monitors
- ? Desktop CPUs
- ? LCD displays – laptops
- ? Notebook computers
- ? CD, CDRW drives
- ? Hard drives
- ? Zip drives
- ? Scanners
- ? DVD drives
- ? Floppy drives
- ? Printers
- ? Speakers
- ? Other _____

Other office equipment

- ? Fax machines
- ? Multifunction machines
- ? Adding machines
- ? Copiers
- ? Other _____

Communication devices

- ? Cell phones
- ? Corded phones
- ? Cordless phones
- ? Answering machines
- ? Pagers
- ? Other _____

Miscellaneous

- ? Pocket PCs
- ? Data cartridges
- ? Battery back-ups/UPS
- ? PC and digital cameras
- ? Servers
- ? Routers
- ? Hubs
- ? Remotes
- ? PDAs
- ? Other _____

5. What services do you provide?

- ? Palletizing & pickup from customer
- ? Sort equipment before donation to non-profit
- ? Hard drive erasure/secure data destruction
- ? Product tracking through final fate of materials
- ? Other? _____

6. Will you provide references, including the most recent clients you have provided service for?

? Yes ? No

B. Compliance with federal, state, and local environmental laws to safeguard occupational and environmental health and safety.

1. Does your company have an EPA ID number? ? Yes ? No

Our number is _____

2. Can you provide information on your company's compliance history? ? Yes ? No

- ? Summary of federal or state environmental agency inquiries and enforcement actions during the past three years (Please attach)
- ? Reports to government agencies from the past three years (Please attach)

Name of person _____ in a state government environmental agency
_____ that is familiar with your operations

3. Can you provide evidence of appropriate permits? ? Yes ? No

- ? Air permit
- ? Storm water permit
- ? Solid Waste permit
- ? Business permit
- ? Zoning permit
- ? Transportation/licensure
- Other _____

4. Can you provide evidence of an environmental management system (EMS), an environmental risk management plan, or electronic recycling certification? ? Yes ? No

- ? ISO 14001
- ? IAER (International Association of Electronic Recyclers)
- ? Other? _____

5. Do you have a hazardous materials management plan? ? Yes ? No

6. Do you meet OSHA requirements? ? Yes ? No

- ? List of applicable OSHA mandates
- ? Summary of OSHA inquiries for past 3 years including health hazard evaluations
- ? Full OSHA citation history
- ? Training records and written programs required by OSHA standards
(Please attach appropriate documents)

7. Is there a trained Environment Health and Safety supervisor on site? ? Yes ? No

Name and contact info _____

C. Documentation regarding end-use markets.

1. Names of countries into which you directly sell unusable scrap materials:

- ? CRTs
 - Whole _____
 - Broken _____
- ? Plastics _____
- ? Metals (steel, aluminum, copper) _____
- ? Circuit Boards _____
- ? Cables/wiring _____
- ? Other materials _____

2. Do you audit the end-markets you sell to directly? ? Yes ? No

3. What percentage (by weight) of all equipment that you receive do you send for disposal as waste in landfills or for incineration? _____ % Tons/year disposed _____

4. If materials are donated to nonprofits, can you supply their federal ID numbers?
? Yes ? No

5. Can you provide a complete record (including type of equipment, model number, serial number, and date received) of all equipment sent to you for recycling, as well as how it was processed? ? Yes ? No

6. Do you export or broker for export used equipment? ? Yes ? No
If Yes, can you provide evidence that you are in compliance with notice and consent procedures specified under international laws and bilateral agreements? ? Yes ? No

D. Other concerns of the State

1. Is your company willing to accommodate state agency concerns? ? Yes ? No
Examples of concerns include:
? Provide notarized documentation of secure destruction of highly sensitive materials
? No export of materials (whole or broken) that are known to fail EPA's TCLP tests to Third World countries
? No use of Federal prison labor

E. Risk management

1. Do you have environmental liability insurance? ? Yes ? No
2. Do you have General Liability Insurance? ? Yes ? No
How much coverage? _____
3. Do you have other types of insurance? ? Yes ? No
4. Do you have financial assurance (e.g., bonding)? ? Yes ? No

F. Disclosure verification

Do you attest that your responses to these questions are accurate and can be verified independently, or through documentation that you provide? ? Yes ? No

G. Please return this questionnaire

By FAX to [name of agency] at [FAX number], ATTN: _____

By MAIL to: Name _____
Agency _____
Address _____

If you have questions or need clarification please contact _____
at [your phone number] or e-mail _____
