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## Recycling Vendor Due Diligence

### I. VENDOR SELECTION

Many states require the permitting of facilities handling and/or processing electronics. Interstate commerce laws dealing with solid waste disposal require that the laws of the state where the waste is disposed, not where the waste originated, be followed.

Be sure that the vendor is properly documented in the state in which it resides. Understand the difference between registration and a license. Registration both with the U.S. EPA and State DEPs simply identifies a facility as storage and/or handling location. Processing electronics normally requires a license and entails having appropriate air quality, water quality and EPA handling permits. A licensed processing facility is audited regularly by regulatory agencies and non-compliance notices are publicly available. EPA compliance documentation from a licensed facility has more regulatory and auditor credibility than documentation from a registered facility. In states with no electronic disposal laws, recycling vendors with ISO 14001 and/or IAER or ISRI certifications represent audited recycling standards.

1. Vendor employee screening criteria:
  - a. Employment history verification
  - b. Criminal record search (at least 7 years)
  - c. Drug screening with annual random screens
  - d. Signed confidentiality agreements
  - e. I-9s
  
2. Operational Security:
  - a. Visitor logs and visitor badges.
  - b. A secure area devoted only to the destruction of the material. No non-secure activity can occur in this area.
  - c. A monitored security alarm system to secure building when unoccupied.
  - d. A security system checklist with monthly records of checking for operational integrity of the system.



3. Recycling process
  - a. Inspection of recycling area. Is it clean and orderly?
  - b. Are incoming shipments logged by date, transporter, shipper, description and weight?
  - c. Are receiving documents retained and properly filed?
  - d. Is each shipment uniquely identified and labeled during the entire auditing process
  - e. What is the audit process of to be recycled material and the control of material after audit?
  - f. How are incoming materials sorted? How are the different sorted materials identified (including dates of arrival) and handled?
  - g. What are the vendor's security procedures for data storage devices? Are data storage devices ever reused? What tools does the vendor use to assure sanitization of data storage devices? What quality control processes does it use to assure complete data destruction?
  - h. Does the vendor resell reusable equipment? Does the vendor broker equipment? Does the vendor sell retail?
  - i. Down stream vendor vetting. Do down stream vendor files include appropriate environmental certifications and business licenses.
  - j. Disposal documentation. Are off site shipping records maintained that include the vendor shipped to the date of shipment, description of materials shipped and weight.
  
4. Endorsements:
  - a. Certificate of environmental compliance includes the recycling facility's EPA license number, location where processing occurred and date of recycling activity completion. An attached inventory audit should include the manufacturer, model, description, serial number and weight of each item processed.
  - b. Certificate of destruction, if required, should include the identification by serial number or count and weight of the items destroyed and the date of destruction. (See destruction vendor due diligence sheet.)
  - c. Does the vendor retain project records and for how long? Are they readily accessible?
  
5. Vendor Assurances:
  - a. The vendor has a valid business license.
  - b. The vendor can provide certificates of insurance showing general liability insurance of at least \$2,000,000, the State required workmen's compensation insurance and professional liability insurance.