



2015 EMS ANNUAL REPORT

Submitted by Waste Commission of Scott County
to the Iowa Department of Natural Resources

July 2015

Waste Commission of Scott County
11555 110th Avenue
Davenport, Iowa 52804

Prepared by the EMS Core Team
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Iowa Solid Waste Environmental Management System Annual Report

Note: Please complete this report in Word or PDF document format. It must contain all the information requested below in the order requested; numeric attachments first, then alphabetic. Attachments should be labeled as requested.

The EMS Annual Report covers the state Fiscal Year July 1 through June 30, and is due September 1. If you have questions, contact Leslie Goldsmith, 515-725-8319, leslie.goldsmith@dnr.iowa.gov.

Planning Area or Landfill Service Area Information:

Name of Planning Area or Permitted Facility Service Area: _____

Mailing Address: _____

Physical Address: _____

City: _____ State: _____ Zip: _____

Name of person filling out report: _____

Phone: _____ Email Address: _____

Items 1 through 7 are frequently changing and should be submitted or reported annually.

**** Check the box if it is attached**

1. Executive Summary (Attachment 1)

Provide an overview of the environmental improvements and benefits achieved during the past year as related to the system’s Objectives and Targets. This information would be similar to what is presented for management review. 567-111.6(1) Include a Summary of Progress against Specific Local Goals.

2. Environmental Aspects and Impacts (Attachment 2)

Attach the list of identified **Significant Environmental Aspects** and **Impacts** stemming from activities, services and facilities in the past year. 561-111.6(3)

3. Legal and Other Requirements (Attachment 3)

Provide a **brief summary** of the organization’s compliance performance for the previous year. List any recurring or significant violations related to the identified legal requirements. Describe progress made in resolving violations. (if there is nothing to report, no attachment is required) 567-111.6(4)

There are no recurring or significant violations to report

4.-6. Six Plan Components (Attachments 4-6) Submit information addressing the EMS Elements for each of the six plan components:

- Yard Waste Management
- Greenhouse Gas Reduction
- Household Hazardous Waste Collection
- Recycling Services
- Water Quality Improvement
- Environmental Education

Provide a document or series of documents (#4-6) detailing information below. 567-111.6(5) If one document contains all the required information, attachments 5 and 6 are not necessary.

4. Provide a report or list of Objectives, with Targets established for achieving the Objectives.

- 5. Provide an **Action Plan** – A listing of the plan that describes the actions necessary to achieve the Objectives and Targets.
- 6. The Action Plan should include the identification of the **individuals and organizations responsible** for carrying out the specific tasks, timelines for completion of each step in the plan and a schedule for periodically reviewing and updating, as conditions dictate, the objectives and targets.
- 7. **Re-evaluation and modification (Attachment 7)**
For each (of the 6) plan components, the report shall identify root causes of those outcomes and develop revised goals and activities appropriate to each. The organization should review EMS Targets and Objectives and the 10 EMS Elements. Submit documentation or a summary stating how **Re-evaluation and Modification** is carried out in the organization. 567-111.6(5)

Items A through E may not change frequently. If the most current version of a document is already on file at DNR there is no need to re-submit it.

- A. Environmental Policy Statement (EPS) (Attachment A)**
Include a copy of the planning or service area's **Environmental Policy Statement** and the date it was last reviewed and, if appropriate, revised. 567-111.6(2)
 - The most current version of the EPS has been submitted:
Date the EPS was adopted or signed: _____
Date the EPS was last reviewed: _____
- B. Environmental Aspects and Impacts (Attachments B and C)**
 - a. Provide a copy of the process/procedure describing the methodology for scoring or weighting Environmental Aspects & Impacts (**Environmental Aspects, Impacts and Significance Criteria**). 567-111.6(3) **(Attachment B)**
 - The most current Environmental Aspects, Impacts and Significance Criteria procedure/process has been submitted:
Date the Aspects/Impacts procedure/process was adopted or signed: _____
Date the Aspects/Impacts procedure/process was last reviewed: _____
 - b. Are there large facility, service or programmatic changes pending (opening a compost site or landfill closure for example) that are likely to change the identified impacts in the coming year, beyond the usual annual fluctuations? 567-111.6(3)
 - Yes. If yes, give a brief summary. **(Attachment C)**
 - No

- C. Legal and Other Requirements (Attachments D and E)**
 - a. Provide the organization's list of **Legal Requirements** for the planning or service area's operations and facilities included in their EMS fenceline, including but not limited to, relevant environmental laws, regulations and permits, and worker health and safety regulations. 567-111.6(4) **(Attachment D)**
 - The most current list of Legal Requirements has been submitted:
Date the Legal list was adopted or signed: _____
Date the Legal list was last reviewed: _____
 - b. Attach the organization's most current procedure or process for tracking changes in legal/regulatory requirements. 567-111.6(4) **(Attachment E)**
 - The most current Legal procedure/process has been submitted:

Date the Legal procedure/process was adopted or signed: _____

Date the Legal procedure/process was last reviewed: _____

D. Communication/Training/Awareness (Attachments F and G)

a. Include a copy of the organization's most current procedure or process for **EMS Communications**, both External and Internal. 567-111.6(5)c(1) (**Attachment F**)

The most current Communication procedure/process has been submitted:

Date the Communication procedure/process was adopted or signed: _____

Date the Communication procedure/process was last reviewed: _____

b. Attach the organization's most current procedure or process for **Training & Awareness**. 567-111.6(5)c(2) (**Attachment G**)

The most current Training & Awareness procedure/process has been submitted:

Date the Training/Awareness procedure/process was adopted or signed: _____

Date the Training/Awareness procedure/process was last reviewed: _____

E. Monitoring and Measurement (Attachment H)

Attach the organization's procedure or description of the process of how the organization monitors key activities (environmental performance). 567-111.6(5)d

It is attached

The most current Monitoring Measurement procedure/process has been submitted:

Date the Monitoring/Measurement procedure/process was adopted or signed: _____

Date the Monitoring/Measurement procedure/process was last reviewed: _____

F. Assessment/Audit (Attachment I-K)

a. Attach the organization's procedure or process for **Assessment/Audit**. 567-111.6(5)e (**Attachment I**)

The most current Assessment/Audit procedure/process has been submitted:

Date the Assessment/Audit procedure/process was adopted or signed: _____

Date the Assessment/Audit procedure/process was last reviewed: _____

b. An **Internal Audit** shall be conducted each state fiscal year. 567-111.6(6)

Did the organization perform an Internal Assessment/Audit since the last Annual Report was submitted? 567-111.6(5)e

Yes (if yes, submit the report and any outcomes such as corrective actions) (**Attachment J**)

Date of Internal Audit: _____

Name of Assessor(s): _____

No (exact dates are not necessary, month/proposed month is sufficient)

Date Audit Scheduled: _____

c. An **External Audit** shall occur each state fiscal year. 567-111.6(7)

Date of last External Audit: _____

External Audit performed by DNR. (no attachment necessary)

A copy of the Non-DNR External Audit is attached (**Attachment K**)

Name and qualifications of Auditor(s) if not DNR: _____

2015 EMS Annual Report: Waste Commission of Scott County

Attachment 1 — Executive Summary

Waste Commission of Scott County provides integrated waste management services for the residents and businesses of Scott County, Iowa, and several surrounding communities through its Scott Area Landfill, Scott Area Recycling Center, Electronic Demanufacturing Facility, and Household Hazardous Materials Facilities. In January 2015, a new Electronics Reuse Program was launched. In addition, the Commission provides environmental education and houses a Keep America Beautiful affiliate called iLivehere. The Commission also operates an Environmental Management System in accordance with the Iowa DNR's Iowa EMS program. Its Electronic Demanufacturing Facility is certified to ISO 14001, OHSAS 18001 and R2 standards.

The following summarizes progress on seven selected objectives—one in each of the six component areas, plus Health & Safety—from July 1, 2014 to June 30, 2015. A brief listing of other objectives follows, with less detail, for general information. Some objectives span multiple years; others do not.

• **ENVIRONMENTAL EDUCATION | Museum Partnership: Record 108 Complete**

With the goal of reaching area children with the message of recycling and reuse, the Commission continues to partner with Putnam Museum on its electronics take-apart exhibit. The initial seven-month run in 2013 drew more than 40,000 visitors. Putnam brought back the exhibit for an “encore” in 2014, which is ongoing at this point. As of June 30, 2015, the encore run has had 77,555 visitors, and our materials and educational items have been included in 15 engineering camps with 389 total students.

• **RECYCLING | E-waste Reuse: Record 117 Complete**

To increase electronics reuse by 100 percent and remain in compliance with 2013 changes to the R2 (Responsible Recycling) standard, the Commission launched a new Reuse Program at the Electronic Demanufacturing Facility in January 2015. Grant funds were used for this project. The program has reached its goal of a 100% increase in reuse, having shipped nine tons of electronics and generating \$64,892 in revenue.

• **HEALTH & SAFETY | Safety Committee: Record 119 Complete**

To comply with ISO 14001:2004 and enhance health and safety, the Commission implemented a Safety Committee in 2014. The Committee set three goals: 1) To meet each month; 2) To conduct 100 percent review and response to incidents regarding safety; and 3) To conduct 100 percent of required training. All goals have been met; in addition, the Committee has implemented a number of other safety measures, including training and ongoing internal and external educational messaging. The Commission's workers' compensation rates also have decreased significantly.

• **HOUSEHOLD HAZARDOUS MATERIALS | HHM Transportation: Record 123 Complete**

In 2014 the Commission researched ways to make hauling hazardous materials safer and more efficient, with the goals of increasing HHM and e-waste collected from business customers, and to increase the number of these customers. The Commission decided to purchase a box truck to fulfill its needs. Grant funds were used for this project. Comparing March-June 2014 with March-June 2015: HHM customers served are up by nine percent, and e-waste material is up by 42 percent. Ongoing use of the truck, and tracking over a longer period, will allow us to see gains more clearly. At this time the truck is an invaluable asset, especially in light of the added safety and service capability.

• **GREENHOUSE GAS | Leachate Recirculation: Record 129 In progress**

The Commission is working to create a semi-automated leachate recirculation system with the goal of decreasing the amount of leachate that has to be hauled to recirculation lines with a semi and tanker. This, in turn, will reduce greenhouse gas emissions from semi use. In late 2014 and early 2015, staff worked to winterize the lines by insulating with hay bales, and a trench-and-pipe installation now controls flow to many lines, among other improvements. In the

first half of 2015, 354,526 gallons of leachate already have been managed through the semi-automatic system; in 2014 a total of 491,070 gallons were managed through auto-recirculation. The project is on track to make a significant impact.

• **WATER QUALITY | Bike Path Recycling: Record 136** *In progress*

The Commission and its partners in Davenport and Bettendorf are collaborating to keep recyclables out of waterways by providing additional receptacles for recycling and trash along heavily used portions of the Duck Creek and Riverfront Bike Trails, with a goal of placing the containers along 24 total miles of trails. Grant funds are being used for this project. In July 2015, containers for trash and recyclables were delivered to the cities. In coming months, educational signage will be placed, concrete pads will be poured, and containers will be installed.

• **YARD WASTE | Organics Study: Record 140** *In progress*

To more effectively manage organics in Scott County, the Commission and its partners will conduct a thorough analysis of the Davenport Compost Facility, which currently composts yard waste and biosolids from Scott County. The goals will include determining facility capacity for handling any additional materials (such as food waste), the potential impacts on the facility and collection if yard waste were accepted at the Scott Area Landfill in light of new legislation, and the potential impacts on the landfill if yard waste were accepted. Current practices for disposing of yard waste will be taken into consideration to determine the most environmentally sound option(s). The analysis will provide a baseline for the project, which will allow for the development of a specific, appropriate environmental metric for this objective.

ADDITIONAL OBJECTIVES & TARGETS

Recycling

- E-waste Development (Record 55, in progress): Conduct more business events to increase e-waste stream
- Salvage Evaluation (Record 95, in progress): Use grant funding to conduct multi-year evaluation and divert materials
- Fairgrounds Recycling (Record 105, complete): Create and measure fairgrounds recycling program; divert materials
- Data Security (Record 118, complete): Expand data security protocol to include data wiping; divert items to reuse
- E-waste Campaign (Record 125, in progress): Implement ongoing messaging and measure program participation
- Recycling Campaign (Record 132, in progress): Implement ongoing messaging and measure program participation
- Single Stream Planning (Record 133, complete): Complete RFP process and garner approvals for single-stream program
- Capturing Recyclables (Record 134, complete): Ensure acceptable materials delivered to the MRF are recycled
- Single Stream Implementation (Record 139, in progress): Create implementation schedule and complete tasks

Environmental Education

- Community Engagement (Record 104, in progress): Increase online engagement; measure Website traffic
- Event Recycling (Record 128, complete): Update program and help more events recycle

Health & Safety

- Enhanced Testing (Record 115, complete): Enhance ongoing surveillance testing at electronics facility

Greenhouse Gas

- Special Waste Wash-Outs (Record 130, in progress): Use grant funds to purchase hydroseeder; decrease traffic on-site

Household Hazardous Materials

- HHM Waste (Record 121, complete): Recycle more metal paint cans and seal paint roll-off to prevent pollution
- HHM Campaign (Record 124, in progress): Implement ongoing messaging and measure program participation

Water Quality

- Litter Control (Record 131, in progress): Collect blowing litter using fences and vacuum; keep debris out of waterways

Significant Environmental Aspects List

Location: **Waste Commission of Scott County**

Significance Value : **19**

Record No.	APS Name	Input	Condition	Aspect	Impact	A*	B*	C*	D*	E*	F*	G*	H*	OA*	OB*	Score	Significant
00567	Collecting Recyclables MRF	All	Abnormal	Exposure/Injuries	Degradation of human health	3	1	4	1	4	1	5	0	0	0	19	Yes
00603	Fire/Explosion/Mine Failure	All	Emergency	Exposure/Injuries	Degradation of human health	3	1	5	1	5	1	5	0	0	0	21	Yes
00207	Fueling and fuel storage at LF	All	Abnormal	Stormwater/Surface Water Discharges	Degradation of soil, water and/or sediment quality	5	4	1	1	4	4	1	0	0	0	20	Yes
00444	Hauling soil and LF cell construction LF	All	Normal	Stormwater/Surface Water Discharges	Degradation of soil, water and/or sediment quality	5	3	1	5	1	3	1	0	0	0	19	Yes
00221	Hauling soil and LF cell construction LF	All	Normal	Land Usage	Aesthetics and community environment	5	3	1	5	3	0	0	0	Yes	0	17	Yes
00414	HHM spills on containment	All	Abnormal	Exposure/Injuries	Degradation of human health	3	1	5	1	3	1	5	0	0	0	19	Yes
00430	Loading and Unloading material on HHM trailer/pickup	All	Normal	Exposure/Injuries	Degradation of human health	3	1	4	4	2	1	4	0	Yes	0	19	Yes
00399	Managing / labpacking normal HHM material (toxics, corrosives, oxidizers)	All	Abnormal	Exposure/Injuries	Degradation of human health	3	1	5	1	5	1	5	0	0	0	21	Yes
00398	Managing / labpacking normal HHM material (toxics, corrosives, oxidizers)	All	Normal	Exposure/Injuries	Degradation of human health	3	1	3	5	3	1	3	0	0	0	19	Yes
00434	Managing automotive fluid drop-off HHM	All	Abnormal	Stormwater/Surface Water Discharges	Degradation of water and/or soil quality	5	5	1	1	4	5	0	0	0	0	21	Yes
00390	Managing automotive fluid drop-off HHM	All	Normal	Stormwater/Surface Water Discharges	Degradation of water and/or soil quality	5	3	1	5	2	3	1	0	0	0	20	Yes

A*Regulated, B*-Potential Impact to Natural Resour

Record No.	APS Name	Input	Condition	Aspect	Impact	A*	B*	C*	D*	E*	F*	G*	H*	OA*	OB*	Score	Significant
00410	Managing garbage from HHM operations	All	Normal	Stormwater/Surface Water Discharges	Degradation of soil, water and/or sediment quality	5	4	1	4	2	2	1	0	0	0	19	Yes
00409	Managing garbage from HHM operations	All	Normal	Waste Generation and Disposal	Use of landfill space	5	2	1	4	2	2	1	0	Yes	0	17	Yes
00396	Managing HHM high hazard material	All	Abnormal	Exposure/Injuries	Degradation of human health	3	1	5	1	5	1	5	0	0	0	21	Yes
00397	Managing HHM high hazard material	All	Normal	Stormwater/Surface Water Discharges	Degradation of water and/or soil quality	5	2	1	3	3	4	1	0	0	0	19	Yes
00403	Managing HHM Sharps / biohazards	All	Abnormal	Exposure/Injuries	Degradation of human health	3	1	5	1	5	1	5	0	0	0	21	Yes
00402	Managing HHM Sharps / biohazards	All	Normal	Exposure/Injuries	Degradation of human health	3	1	3	5	2	1	4	0	0	0	19	Yes
00218	Managing leachate and condensate LF	All	Abnormal	Stormwater/Surface Water Discharges	Degradation of soil, water and/or sediment quality	5	4	1	1	4	4	1	0	0	0	20	Yes
00348	Managing litter at LF	All	Normal	Stormwater/Surface Water Discharges	Degradation of water and/or soil quality	3	3	1	5	3	3	1	0	0	0	19	Yes
00538	Managing sediment/erosion	All	Abnormal	Stormwater/Surface Water Discharges	Degradation of soil, water and/or sediment quality	3	4	1	5	3	3	1	0	0	0	20	Yes
00521	Managing Special Waste	All	Normal	Dust Generation	Degradation of air quality	5	3	1	5	2	3	1	0	0	0	20	Yes
00523	Managing Special Waste	All	Normal	Air Emissions	Degradation of air quality	3	2	1	5	1	2	1	0	Yes	0	15	Yes
00502	Managing traffic onsite	All	Normal	Exposure/Injuries	Degradation of human health	3	1	2	5	3	1	2	0	0	0	19	Yes

A*Regulated, B*-Potential Impact to Natural Resour

Record No.	APS Name	Input	Condition	Aspect	Impact	A*	B*	C*	D*	E*	F*	G*	H*	OA*	OB*	Score	Significant
00458	Mixing the solidification pit LF	All	Normal	Dust Generation	Degradation of air quality	3	4	1	5	3	4	1	0	0	0	21	Yes
00551	Monitoring methane, groundwater, stormwater, leachate LF	All	Normal	Air Emissions	Degradation of air quality	1	2	1	4	1	2	1	0	Yes	0	12	Yes
00548	Providing a recycling program PUB ED	Environmental Education	Normal	Recycling	Preservation of landfill space/Conservation of natural resources	1	1	1	2	2	1	1	0	Yes	0	9	Yes
00379	Providing a recycling program PUB ED	Environmental Education	Normal	Education	Increase in awareness and environmental stewardship	1	1	1	2	2	1	1	0	Yes	0	9	Yes
00383	Providing an HHM program PUB ED	Environmental Education	Normal	Education	Increase in awareness and environmental stewardship	1	1	1	2	2	1	1	0	Yes	0	9	Yes
00384	Providing compost opportunities PUB ED	Environmental Education	Normal	Education	Increase in awareness and environmental stewardship	1	1	1	2	2	1	1	0	Yes	0	9	Yes
00342	Recovering methane gas LF	All	Normal	Air Emissions	Degradation of air quality	5	3	3	5	3	0	0	0	Yes	0	19	Yes
00581	Sorting Material MRF	All	Normal	Waste Generation and Disposal	Use of landfill space	1	3	1	5	5	3	1	0	Yes	0	19	Yes
00433	Testing of unknown HHM material	All	Abnormal	Exposure/Injuries	Degradation of human health	3	1	5	1	5	1	5	0	0	0	21	Yes
00429	Transporting HHM, CESQG, and event material	All	Abnormal	Stormwater/Surface Water Discharges	Degradation of soil, water and/or sediment quality	5	4	1	1	5	4	1	0	0	0	21	Yes

A*Regulated, B*-Potential Impact to Natural Resour

Record No.	APS Name	Input	Condition	Aspect	Impact	A*	B*	C*	D*	E*	F*	G*	H*	OA*	OB*	Score	Significant
00427	Transporting HHM, CESQG, and event material	All	Abnormal	Exposure/Injuries	Degradation of human health	3	1	4	1	4	1	5	0	0	0	19	Yes
00558	Unloading HHM and CESQG appointments	All	Abnormal	Exposure/Injuries	Degradation of human health	3	1	4	1	4	1	5	0	0	0	19	Yes

A*Regulated, B*-Potential Impact to Natural Resour

Record No.	APS Name	Input	Condition	Aspect	Impact	A*	B*	C*	D*	E*	F*	G*	H*	OA*	OB*	Score	Significant
00198	Conducting downstream due diligence on data-containing material EDF positive	All	Normal	Data Security	Prevention of data breach	5	1	1	5	5	0	0	0	Yes	Yes	17	Yes
00613	Fire/Explosion EDF	All	Emergency	Exposure/Injuries	Degradation of human health	2	1	5	1	5	1	5	0	0	0	20	Yes
00618	Intense rain and erosion EDF	All	Emergency	Stormwater/Surface Water Discharges	Degradation of water and/or soil quality	5	5	1	1	3	4	1	0	0	0	20	Yes
00626	Managing All Focus Materials EDF	All	Normal	Exposure/Injuries	Degradation of human health	5	1	3	5	1	1	3	0	0	0	19	Yes
00630	Managing Broken CRT Glass	All	Normal	Exposure/Injuries	Degradation of human health	5	1	3	5	1	1	3	0	0	0	19	Yes
00633	Managing CRT Material EDF	All	Emergency	Exposure/Injuries	Degradation of human health	5	1	4	1	5	1	3	0	0	0	20	Yes
00637	Managing CRT Material EDF	All	Normal	Stormwater/Surface Water Discharges	Degradation of water and/or soil quality	5	3	1	5	1	3	1	0	0	0	19	Yes
00642	Managing Focus Material EDF	All	Abnormal	Exposure/Injuries	Degradation of human health	5	1	5	1	3	1	3	0	0	0	19	Yes
00386	Providing education for the public on environmental programs and services PUB ED	Environmental Education	Normal	Education	Increase in awareness and environmental stewardship	1	1	1	2	2	1	1	0	Yes	0	9	Yes
00364	Providing internal and external education on the Commission's EHSMS and R2 certification PUB ED	All	Normal	Education	Increase in awareness and environmental stewardship	3	1	1	2	2	1	1	0	Yes	0	11	Yes
00667	Shredding CRT's EDF	All	Abnormal	Exposure/Injuries	Degradation of human health	3	1	5	1	3	1	5	0	0	0	19	Yes
00673	Shredding Non-CRT Material EDF	All	Abnormal	Exposure/Injuries	Degradation of human health	3	1	5	1	5	1	5	0	0	0	21	Yes

A*Regulated, B*-Potential Impact to Natural Resour

Location: WCSC-R2

Significance Value : 19

Record No.	APS Name	Input	Condition	Aspect	Impact	A*	B*	C*	D*	E*	F*	G*	H*	OA*	OB*	Score	Significant
00678	Tornado/ High Winds EDF	All	Emergency	Exposure/Injuries	Degradation of human health	3	1	5	1	3	1	5	0	0	0	19	Yes

A*Regulated, B*-Potential Impact to Natural Resour

Printed: 7/6/2015

**2015 EMS Annual Report: Waste Commission of Scott County
Attachment 3: Legal and Other Requirements**

Summary: Nothing to report.

2015 EMS Annual Report: Waste Commission of Scott County
Attachment 4: Objectives & Targets list

Waste Commission of Scott County — 2015 List of Objectives Targets

Record No.	EMS Info	Objective	Target	Person Responsible	Target Date	Final Completion Date	Final Completion Notes
55	Recycling	Increase e-waste stream at facility through policy, business development, education and partnerships.	Pounds of e-waste managed.	Stalcup, Bryce	6/1/2016		In progress
95	Recycling	To maximize landfill capacity through technology, diversion and beneficial use opportunities.--Research diversion markets	Increase pounds diverted and in-place density	Seals, Brian	10/15/2015		In progress
104	Environmental Education	Increase resident engagement with the Commission and its non-profit Keep America Beautiful Affiliate, iLivehere, through social media	Use social media to increase website traffic, followers, and community engagement.	Liske, Kurt	8/31/2015		In progress
108	Recycling	Reuse materials entering the facility through a creative, educational community partnership	Collaborate with Putnam Museum, Davenport, on its electronics take-apart exhibit to reach area children with the recycling message	Liske, Kurt	9/30/2014	8/29/2014	This O&T has officially been completed, but the WCSC/Putnam Museum partnership continues. The initial 7 month exhibit saw more than 40,000 visitors. It was such a success that the Putnam requested to bring it back for an 'encore exhibition' with an open ended end date. Through June 30th, 2015, the second round of the exhibit has had 77,555 visitors, and our material and educational items have been included in 15 engineering camps that have consisted of 389 students.
115	Health & Safety	Further enhance surveillance testing at EDF on staff focusing on heavy metal exposure and environment.	To continually to prevent exposure to staff, public and the environment.	Krambeck, Keith	2/28/2015	12/18/2014	Ongoing sampling will allow us to continuously evaluate and update, as needed, the types of testing needed at the Electronic Demanufacturing Facility, with the goal of continually preventing harmful exposure to staff, public and the environment.
117	Recycling	Expand e-waste reuse capabilities	Increase reused material at e-waste facility by 100% in FY 2015	Stalcup, Bryce	2/28/2015	2/17/2015	A reuse equipment grant was written, accepted and implemented within the e-waste facility. Shelving, hardware, software, a new data security area and other misc items were installed creating a full functioning reuse wing of e-waste. Sorting, testing, refurbishing, selling, return, and quality assurance procedures have been completed and implemented with appropriate staff training. Consistent diversion from inbound material and the demanufacturing area to the reuse program is proceeding satisfactorily. To date over 22,822lbs has been diverted to the reuse area with an addition in value of between 10 and 50x depending upon the reuse item than if it would of been demanufactured and recycled. Material testing, cleaning, refurbishment, sales and packaging has begun with processes being continuously evaluated and improved as the program matures. All material weights are being recorded as it comes into and out of the reuse area. Enhanced material value and marketability from reuse is evaluated on an ongoing basis.
118	Recycling	Expand data security program to include data wiping/auditing.	Research and implement data wiping hardware, software and procedures.	Stalcup, Bryce	12/31/2014	12/15/2014	Site visits to PCR rebuilders and Dynamic recycling took place researching reuse business plans and their data destruction procedures. Data erasing companies were researched for cost, quality and customer service. Tabernus was the company that was selected to provide us with the hardware and software to securely wipe data containing harddrives. The data erasing hardware and software was installed, procedures were created and training was conducted with all required parties. To date we have wiped a total of 1009 hard drives adding a increase in value to the commission of \$9000 and conforming to the R2 hierarchy of reuse before recycle.

Waste Commission of Scott County — 2015 List of Objectives Targets

Record No.	EMS Info	Objective	Target	Person Responsible	Target Date	Final Completion Date	Final Completion Notes
119	Health & Safety	Improve employee safety by implementing a safety committee.	Create and Implement a Safety Committee	Stalcup, Bryce	12/31/2014	12/31/2014	A safety Committee was formed with the first meeting being held 4-16-14. A safety Committee procedure was created and is covered each time a new member is added/replaced. Members serve a 6 month term and a chair is elected by the committee. The safety Committee set 3 goals for the year. 1. Meet every month, 2. Conduct 100% review and response to incidents regarding safety, and 3. conduct 100% of required training. All of these goals have been met as of 12-31-2014. The Safety Committee has also implemented: monthly safety committee messages/gift reminders, further training, committee involvement safety plan and policy review, accident evaluation and response with recommendations, and much more. See safety committee meeting minutes for more information. It has been determined that the safety committee adds tremendous value to the Waste Commission and will continue.
121	Household Hazardous Materials	Minimize the impact to natural resources when managing HHM waste.	Implement new measures to decrease the impact to natural resources.	Stalcup, Bryce	6/30/2015	5/29/2015	Through brainstorming and experimentation we have implemented process and operational changes to decrease the impact to natural resources while managing HHM waste. These changes include: 1. Good latex paint that comes through the program is bulked as much as possible allowing us to recycle the original metal containers. since the beginning of March we have recycled 1800lbs of scrap metal on top of what we normally recycle through the HHM. 2. We transport bad latex paint by roll off at our satellite HHM facility. After noticing the roll off leaking paint we have installed a water tight seal and begun handling paint more carefully decreasing the risk of contamination to natural resources.
123	Household Hazardous Materials	Evaluate how we transport and load/unload CESQG and Ewaste material.	Implement measures to enhance staff safety and increase Ewaste and CESQG participation	Stalcup, Bryce	6/30/2015	5/26/2015	The purchase of the box truck is a huge asset to the HHM and E-waste programs. The truck loads and unloads with ease. There is no longer heavy lifting of trailer sides involved. Everything can be unloaded using fork trucks and pallet jacks, making the process much safer and quicker. We have also conducted business events with Group O, John Deere, and Sears Manufacturing using the truck. In terms of collection and management of material, early numbers from a very short period—March through June 2015 as compared to the same period in 2014—are mixed. While HHM customers served are up by 9 percent, material collected is down by 26 percent; and while e-waste customers served are down by 2 percent, material collected is up by 42 percent. It bears noting that customers served and amount of material collected is undoubtedly impacted by several factors, both internal and external. Ongoing use of the box truck, and tracking of customers and material collected over a longer period, will allow us to see gains more clearly. At this time we believe the truck to be an excellent investment and an invaluable asset, especially in light of the added safety and service capability that it provides, which are much more difficult to quantify.
124	Household Hazardous Materials	Increase use of solid waste services and awareness. -- Create ongoing maintenance messaging campaign for HHM. (Strategy 1A)	Increase scheduled HHM appointments year over year by 2.5% each year in 2014, 2015 and 2016.	Welvaert, Brandy	12/31/2016		In progress

Waste Commission of Scott County — 2015 List of Objectives Targets

Record No.	EMS Info	Objective	Target	Person Responsible	Target Date	Final Completion Date	Final Completion Notes
125	Recycling	Increase use of solid waste services and awareness. -- Create ongoing maintenance messaging campaign for e-waste. (Strategy 1A)	Increase residential e-waste customers to the facility year over year by 2.5% each year in 2014, 2015 and 2016.	Welvaert, Brandy	12/31/2016		In progress
128	Environmental Education	Increase the number of events utilizing the Event Recycling Program in 2014 by 10% over 2013	10% over calendar year 2013	Webinger, Paula	12/31/2014	12/23/2014	In calendar year 2013, 36 events participated in our event recycling program. In calendar year 2014, 41 known events recycled, which represents a 13.89% increase. Of the 41 events, 36 loaned containers while 5 organizations/events utilized the Commission grant program to purchase their own recycling containers for ongoing use.
129	Greenhouse Gas	Create a semi-automated leachate recirculation system to manage some of the landfill's leachate	Decrease amount of leachate that has to be hauled to LF's recirculation lines with the semi & tanker. Reduction of GHG, fuel usage, staff time.	Seals, Brian	1/1/2016		In progress
130	Greenhouse Gas	Allow special waste contractors to utilize our hydroseeder to wash out their tankers	Decrease onsite special waste truck traffic by 40%	Seals, Brian	11/20/2015		In progress
131	Water Quality	Increase efficiencies in controlling and collecting onsite litter	Number of fences constructed	Seals, Brian	8/31/2015		In progress
132	Recycling	Increase use of solid waste services and awareness. -- Create ongoing maintenance messaging campaign for recycling. (Strategy 1A)	Increase recycling in Scott County by reaching a majority of residents through marketing in 2014, 2015 and 2016.	Welvaert, Brandy	12/31/2016		In progress
133	Recycling	Finalize implementation plan for single stream recycling.	Approve recommendation on single stream implementation plan.	Morris, Kathy	12/31/2014	8/21/2014	On 8/14/14 the Commission approved a recommendation made 6/18/14 on the results of the Single Stream Request for Proposal. Based upon review of the proposals and discussion with the Commission Management Team and the Executive, Finance and Staff Coordinating Committees, Jim Miles-Polka, PE with Foth Infrastructure and Environment, LLC, prepared the following recommendation as part of a memorandum: Foth recommends the Commission pursue implementing a Commission owned and operated recycling facility for receiving, processing and marketing of single stream recyclable materials through capital improvements and operations modifications to the existing Scott Area Recycling Center facility. The first step will be to contract for the additional tonnage and then proceed with the facility and equipment modifications. Steps to be taken by Commission Management Team in coordination with Executive, Finance and Staff Coordinating Committee prior to the next Commission meeting(s): •Develop support resolutions for interested government partners in the Bi-State planning area. •Develop revenue agreements to secure additional tonnage. •Evaluate financing options including bonding and available grants. •Evaluate potential options for dedicated funds covering cart replacement, market volatility and debt reserve. •Confirm capital improvement needs for building modifications and single stream equipment, including evaluation of current bid market climate. •Evaluate the impact to the Commission's overall 20 year life cycle cost analysis for all facilities and services. •Develop detailed schedule for implementing the single stream collection and processing program.

Waste Commission of Scott County — 2015 List of Objectives Targets

Record No.	EMS Info	Objective	Target	Person Responsible	Target Date	Final Completion Date	Final Completion Notes
134	Recycling	Ensure that acceptable materials delivered to MRF are recycled through enhanced training, equipment maintenance and monitoring of plant trash receptacles.	Decrease the incidence of reported re-sorting of materials from trash receptacles to capture recyclables by at least 25 percent over an eight-month period at the MRF.	Krambeck, Keith	10/31/2014	10/30/2014	More acceptable materials are being captured and recycled at the MRF than before. Through enhanced training, equipment maintenance and monitoring of plant trash receptacles, more materials that previously would have fallen off the end of the belt and into the trash—and therefore would have been landfilled—are being captured for recycling. Contracted sorting staff has been re-trained, helpful signage was created, equipment maintenance was completed, and MRF staff monitors trash containers for recyclable materials, re-running trash if a visual inspection reveals more than 2 percent recyclables. It bears noting that identifying a metric for this objective proved difficult. Staff discussed using the weight of MRF trash, which could be argued would contain fewer recyclables and therefore weigh less overall following the completion of the objective; however, it was decided that MRF trash numbers are impacted by numerous outside/uncontrolled variables that would render the measurement less than meaningful in terms of recyclables captured. Finally it was decided to use the occurrence of re-sorting trash bins as the metric. MRF staff reports that overall occurrence of re-sorting trash between the end of March and October of 2014 has decreased by 75 percent.
136	Water Quality	Keep debris out of waterways by providing additional receptacles for recycling and trash along heavily used portions of the Duck Creek and Riverfront Bike Trails	Provide trash and recycling containers along 24 total miles of trails	Webinger, Paula	10/30/2015		In progress
139	Recycling	Implement Single Stream Recycling	Single stream curbside recycling begins in Davenport and Bettendorf.	Morris, Kathy	7/11/2016		In progress
140	Yard Waste	More effectively manage yard waste in Scott County in light of changes in state legislation that allow for landfilling of such waste at facilities that produce methane for energy	Depending upon results from both internal and external analysis of yard waste management in Scott County and subsequent changes in yard waste management, measure the effectiveness of changes in programs and services by tracking one or more of the following environmental metrics: Amount of methane produced at the Scott Area Landfill, amount of methane used for energy produced at the Scott Area Landfill, amount of yard waste collected through municipal programs, and/or amount of yard waste collected at Davenport Compost Facility.	Welvaert, Brandy	12/28/2016		In progress

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Attachments 5-6: Action Plan

Waste Commission of Scott County — 2015 Action Plan

List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
Objective No.: 55					
1	Evaluate reuse opportunities	Attending Corporate e-Waste Disposal conference networking for reuse opportunities Attended IL Corporate Ewaste Conference networking/contact with mfr,business, and processors about reuse opportunities. Little interest in residential material for reuse.	Krambeck, Keith	6/30/2012	6/29/2012
2	Develop partnerships with manufacturer for Illinois e-waste	Attended IL Corporate Ewaste Conference Jul 29-Aug 2, 2012. Networked/contact with mfr, business, and processors for reuse opportunities.Attended IL Corporate Ewaste Conference April 8-10th and Illinois Ewaste Conference April 30, 2013. Based upon information presented, developing partnerships with manufacturers for IL on hold.	Krambeck, Keith	6/30/2012	6/29/2012
3	Increase awareness of facility benefits among potential customers (data security message).	No further progress to report	Krambeck, Keith	12/31/2014	12/31/2014
4	Maximize e-waste convenience to increase participation	We have begun conducting more business ewaste events for staff at each business. These relationships have begun to increase electronic recycling not only on the residential side of things but also the business side. Events that have contributed directly to business recycling are Group O (5,010 pounds), Sears Manufacturing (5,791 pounds) and John Deere (39,193 pounds HHM; 43,896 pounds e-waste). We also did an event for the city of Hillsdale, IL (5,175 pounds e-waste). Our reputation also has helped us manage waste for banks, hospitals, medical offices and other large corporations like Von Maur.	Stalcup, Bryce	6/1/2016	

Waste Commission of Scott County — 2015 Action Plan

List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
Objective No.: 95					
1	Research markets and other programs for carpet, drywall, compostable paper, food waste, Styrofoam, mattresses	Setting up a pilot partnership/agreement with Heritage Interactive which should be finalized by September 1, 2012. We will spot a trailer at our the landfill and be working with contractors to sort/separate carpet. We will hold a workshop similar to our shingle recycling workshop to encourage carpet recycling. We will be evaluating our pricing structure to see if we will be able to reduce our rates on source separated carpet.	Carlstrom, Carrie	12/31/2013	12/31/2013
2	Gather data on quantities of below items currently landfilled	Based off of the IDNR 2011 waste sort, we know that there are recyclables in our waste stream. WCSC operators have observed large amounts of cardboard, clean wood, and scrap metal in our waste stream. So we thought we would sort it to get quantities.	Moore, Nolan	11/1/2013	5/16/2014
3	Identify all commodities that will be sorted as part of our salvage evaluation.	we will have start pulling out the following commodities: scrap metal, wood, cardboard. We will also try and identify quantity of clean shingles, vinyl siding, carpet, and get a count on mattresses.	Seals, Brian	12/30/2013	5/16/2014
4	Conduct Salvage evaluation at working face and customer drop off area	As of June 30, 2014, we have conducted 2 weeks of salvage evaluation at the working face and we will be duplicating the 2 weeks of evaluation to verify the results. We have used three different models for evaluation: 1. Having several seasonals at working face pulling out salvagable material. 2. Having one seasonal in excavator and endloader pulling out salvagable material 3. Having a seasonal at our customer drop off area educating small haulers on what products can be diverted and where they go. We will then not have the seasonal there and sort just the customer drop off boxes to quantify the effectiveness of that employee and their education.	Moore, Nolan	8/15/2014	8/4/2014
5	Buy rolling carts and keep a seasonal employee at customer convenience area for the entire summer		Moore, Nolan	9/1/2015	

Waste Commission of Scott County — 2015 Action Plan
List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
6	If feasible, implement diversion program(s)		Moore, Nolan	9/30/2015	
Objective No.: 104					
1	Post weekly videos to Facebook	Created timelapse Tuesday, which shows timelapse videos of Commission employees at work. Videos are posted weekly to the iLivehere Facebook page.	Liske, Kurt	7/1/2013	6/18/2013
2	Increase size of social media audience, and number of people reached	To help increase the our social media presence WCSC has created a \$5.00 per day social media budget. The paid social media campaign began in December 2013. The funds were only used for the Waste Commission Facebook page, no money was allotted to the iLiveHereQC page. Key stats related to both pages are recorded in the "Progress Notes" EMP of this O&T.	Liske, Kurt	8/31/2015	
3	Regularly post photos to Facebook	At least once a week, share pictures of various projects as they occur. Also share photos of points of interest that are timely and interesting (e.g. seasonal shots).	Liske, Kurt	8/1/2013	8/1/2013

Waste Commission of Scott County — 2015 Action Plan
List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
4	Progress notes	<p>05/01/13 - 450 09/11/13 - 460 12/02/13 - 592 01/02/14 - 592 02/03/14 - 597 03/03/14 - 602 04/01/14 - 606 05/02/14 - 613 06/02/14 - 614 07/01/14 - 618 08/01/14 - 621 09/01/14 - 622 10/01/14 - 621 11/01/14 - 649 12/01/14 - 649 01/01/15 - 651 02/01/15 - 652 03/01/15 - 653 04/01/15 - 650 NOTE: Facebook purged non-active followers in March '15. This is why there's a dip in followers. 05/01/15 - 654 06/01/15 - 654 07/01/15 - 655 Waste Commission of Scott County 12/02/13 - 77 01/02/14 - 83 02/03/14 - 118 03/03/14 - 113 04/01/14 - 285 05/02/14 - 479 06/02/14 - 655 07/01/14 - 716 08/01/14 - 787 09/01/14 - 859 10/01/14 - 1054 11/01/14 - 1193 12/01/14 - 1360 01/01/15 - 1378 02/01/15 - 1391 03/01/15 - 1401 04/01/15 - 1388 NOTE: Facebook purged non-active followers in March '15. This is why there's a dip in followers. 05/01/15 - 1390 06/01/15 - 1391 07/01/15 - 1393 WasteCom.com page views (total number of wastecom.com pages that get viewed): Dec. '13 - 39234 Jan. '14 - 35202 Feb. '14 - 32086 Mar. '14 - 34454 Apr. '14 - 36514 May '14 - 44222 Jun. '14 - 39734 Jul. '14 - 39311 Aug. '14 - 29451 Sep. '14 - 29212 Oct. '14 - 29865 Nov. '14 - 25899 Dec. '14 - 41947 Jan. '15 - 31642 Feb. '15 - 23222 Mar. '15 - 50528 Apr. '15 - 50684 May '15 - 65936 Jun. '15 - 70405 Jul. '15 - Facebook engagement (the number of unique users who engaged with our page in the last 4 weeks. Engagement includes any click or content created): iLiveHereQC: 12/02/13 - 4162 01/02/14 - 2450 02/03/14 - 1371 03/03/14 - 668 04/01/14 - 2004 05/02/14 - 2440 06/02/14 - 8646 07/01/14 - 349 08/01/14 - 17 09/01/14 - 49 10/01/14 - 17 11/01/14 - 138 12/01/14 - 22 01/01/15 - 128 02/01/15 - 166</p>	Liske, Kurt	8/31/2015	

Waste Commission of Scott County — 2015 Action Plan
List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
5	Research how other organizations are utilizing social media, and explore possibility of "paid post" usage to increase followers.	<p>Attended four-hour social media seminar on Aug. 14, 2013 that provided information about how other local organizations use social media and provided training on how to advertise on Facebook using sponsored posts, ads, contests, and offers.</p> <p>=====</p> <p>Attended a full day workshop (01/23/14) specifically geared towards marketing for the solid waste industry. Workshop was held in Des Moines, and put on by the ME&V advertising agency. Topics included social media, traditional media, advertising buys and negotiations. As part of the workshop ME&V provided several follow up webinars. Which Kurt Liske participated in.</p>	Liske, Kurt	8/31/2015	8/14/2013
Objective No.: 105					
1	Meet with fairgrounds director to discuss benefits of a recycling program	Met with Bob Fox, fairgrounds director/CEO. Agreed to move forward with an official recycling program for the first time in the MVF's 94 year history. Program will target recyclable cans and bottles, corrugated cardboard, and chipboard.	Liske, Kurt	3/4/2013	3/4/2013
2	Use grant funds to purchase recycling containers to be distributed throughout the fairgrounds	Purchased 80 ClearStream event recyclers with custom "Mississippi Valley Fair Recycles" labels to be dispersed during the week of the Mississippi Valley Fair.	Liske, Kurt	7/12/2013	7/12/2013

Waste Commission of Scott County — 2015 Action Plan
List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
3	Record number of pounds of material diverted from the landfill	2013 - Total: 3.25 tons (6,500) Co-mingled containers (to dirty/contaminated to be returned for deposit): .1 tons (200 pounds) Chipboard: .89 tons (1,780 pounds) Corrugated Cardboard: 2.26 tons (4,520 pounds) Aluminum cans and plastic bottles (clean material returned for \$0.05 deposit): 224lbs (8202 cans and bottles) - \$410.10 in redemption money returned to MVF ===== Non-Fair event recycling at the fairgrounds has resulted in \$1833.90 in savings for the fairgrounds while diverting 36,678 cans and bottles from going to area landfills. ===== 2014: Total 2.96 tons 1.12 tons (2,240lbs) of OCC/Chipboard was diverted. 50,0000 pop and cans, approximately 1470 pounds valued at \$2500 was diverted during fiscal year 2015.	Liske, Kurt	8/12/2013	8/26/2013
4	Educate MVF staff and the public	Create labels for recycling containers, including Mississippi Valley Fair Recycles brand. Prepare and provide event recycling guide to Fairgrounds staff. Write pre- and post-event press releases about the program. Post to social media the week of the fair encouraging people to utilize recycling stations.	Liske, Kurt	8/4/2013	8/4/2013
5	Create branding and logo for program	Worked with contractor to develop a brand and logo for Mississippi Valley Fair Recycles; provide all necessary digital files to MVF staff for future use in education, promotions, etc.	Welvaert, Brandy	5/1/2013	5/1/2013

Waste Commission of Scott County — 2015 Action Plan
List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
6	Follow up with MVF with suggestions for next year	A 2013 MVF follow up meeting was held on Sept. 3rd. Key MVF and WCSC discussed successes and struggles during the past year's event. The following abridge issues were discussed: -Re-evaluate how recycling containers are dispersed (particularly how many are designated for cans vs bottles). -Examine better signage indicating where to find recycling stations. Also consider recycling "hubs" in addition to dispersal throughout the grounds -Educate all MVF staff on who's to collect cans and bottles (and cut down on theft) -Combine cans and bottle storage to one semi rather than two separate semi's - Remove open top roll-off from infield unless grandstand crew can guarantee its use and clean loads. -Continue to use two roll offs for corrugated and chipboard.	Liske, Kurt	9/30/2013	9/3/2013
7	Counsel MVF staff on recycling logistics and on how to divert more material from area LFs.	Provided the following (abridged) feedback after 2013 MVF: -Re-evaluate how recycling containers are dispersed (particularly how many are designated for cans vs bottles). -Examine better signage indicating where to find recycling stations. Also consider recycling "hubs" in addition to dispersal throughout the grounds - Educate all MVF staff on who's to collect cans and bottles (and cut down on theft) -Combine cans and bottle storage to one semi rather than two separate semi's -Remove open top roll-off from infield unless grandstand crew can guarantee its use and clean loads. -Continue to use two roll offs for corrugated and chipboard.	Liske, Kurt	8/31/2014	8/20/2014
Objective No.: 108					

Waste Commission of Scott County — 2015 Action Plan
List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
1	Meet with Putnam staff to discuss working together on an electronics take-apart exhibit in late summer/early fall; evaluate feasibility of providing electronic materials to Putnam	Met with Putnam staff to discuss working together on an electronics take-apart exhibit in late summer/early fall. Had internal discussions about feasibility of providing materials and decided it will work but need to follow our policy with an E-waste Reuse form. Also decided to create a Memorandum of Understanding between EDF & Putnam to outline the partnership and use of materials.	Liske, Kurt	5/15/2013	5/15/2013
2	Create MOU	Created MOU and shared with Putnam staff. Also communicated tracking method for shipments in/out with EDF staff, as materials are to be used on a loan-only basis. The MOU is housed in the EDF scale office.	Krambeck, Keith	6/1/2013	6/1/2013
3	Provide educational print/visual materials for use in exhibit space	Provide educational print/visual materials for use in exhibit space	Welvaert, Brandy	6/7/2013	6/7/2013
4	Provide materials in containers to Putnam Museum on an as-needed basis	Provided materials in containers to Putnam Museum when they call for more. Demanufactured materials are returned and new materials provided in one visit.	Briggs, Brian	6/7/2013	6/7/2013

Waste Commission of Scott County — 2015 Action Plan
List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
5	Evalute event partnership with Putnam staff	<p>Due to visitor positive reponse to the reuse partnership, the Putnam has requested to extend event through the end of Jan. 2014.</p> <p>===== A post partnership meeting was held on Feb. 4th 2014 with Shaun Graves of the Putnam, Brian Briggs, Brandy Welvaert, Keith Krambeck, and Kurt Liske of the Waste Commission. The group discussed the previous partnership, and Shaun indicated the Putnam would like to repeat the partnership (under the same general structure) starting again in the summer of 2014. Most likely beginning in July. Graves also provided several statistics on the number of visitors during the time of the WCSC exhibit. From June 21st 2013 to January 19th 2014: *41,864 peopel visited the Putnam Museum, and the "Take Apart Studio" provided by the WCSC *47 school groups visited the museum *3,043 students toured the museum *2 engineering camps were held for students who specifically used WCSC e-waste for educational purposes.</p>	Krambeck, Keith	3/14/2014	2/4/2014
6	Organize a return of the Putnam/WCSC Take Apart Studio	<p>Based on the success of the original Take Apart Studio the Putnam has asked if we could do another round of the exhibit, following the same format. The 2014 Take Apart Studio opened May 31st. 3 gaylords of prescreened electronics were sent to the Putnam on May 29th. The exhibit will procede using the same format as the 2013 exhibit. As of August 27th, 2014, 9 gaylords of material have been shipped to the Putnam, and have been subsequently returned. This is a total of 5,830lbs of material.</p>	Liske, Kurt	7/1/2014	5/29/2014
Objective No.: 115					

Waste Commission of Scott County — 2015 Action Plan

List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
1	Consult with environmental hygienist to evaluate expanded testing parameters	Met with Todd Bloodworth representing QC Environmental on 6/10/14 to evaluate existing and potential testing parameters at EDF. Upon review, recommendation is to continue existing protocols and expand frequency of testing of material collected from dust handling system. This would include expanding the list of metals for presence and levels. Results would be indicator of potential exposures.	Krambeck, Keith	6/15/2014	6/10/2014
2	Implement further testing criteria	A target list of analytes was developed based on a joint study by NIOSH and the CDC on exposure risks associated with electronic demanufacturing facilities. It was determined to start with the elements that had the highest concentrations in the study and had a defined exposure limit. The results from the bulk dust testing would be the basis for the analytes that may be found in dust and air monitoring samples for future sampling events.	Krambeck, Keith	10/15/2014	9/3/2014
3	Conduct testing on shredder dust to identify analytes present	Totals test for sixteen analytes was performed on shredder dust to compare with previous five analytes performed in previous years. Concentration levels will be the basis to expand testing parameters. Recommendations will be submitted in final report by consultant.	Krambeck, Keith	2/28/2015	10/8/2014
4	Create testing plan based upon wipe sample analyses	Following analyses of 16 analytes, QC Environmental proposed a sampling plan for 2015. The plan will begin in Feb. 2015 with wipe sampling for 15 analytes to take place Feb. 12, 2015. Following the wipe sample and results, a second phase of testing will take place Feb. 26, 2015. In addition, noise and Co monitoring are scheduled for March 18, and air monitoring for metals and particulates is scheduled for April 15. We will follow this ongoing process for shredder sampling, wipe sampling, and noise/CO/air monitoring to continuously evaluate and improve our testing, with the goal of protecting employee health & safety.	Krambeck, Keith	12/19/2014	12/18/2014

Waste Commission of Scott County — 2015 Action Plan
List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
Objective No.: 117					
1	Determine costs and what equipment will be needed for a reuse area to apply to the grant.	Shelving, hardware, software, data security area and other misc items were researched. Costs were determined and are ready to apply them to the grant.	Stalcup, Bryce	3/21/2014	3/21/2014
2	Write up and apply for reuse equipment grant.	The grant was written and turned in.	Stalcup, Bryce	3/31/2014	3/31/2014
3	After receiving grant finalize needed material and order.	Grant was approved and material was ordered.	Stalcup, Bryce	7/1/2014	7/1/2014
4	Construct and implement reuse area	The reuse area has been constructed with a series of shelving systems and a data security area. Computers and testing stations are in the process of being installed and will continue as the program matures. Procedures are being updated and trained upon to reflect process changes.	Stalcup, Bryce	7/31/2014	7/29/2014
5	Evaluate Reuse changes and document diverted tonnage.	Sorting, testing, refurbishing, selling, return, and quality assurance procedures have been completed and implemented with appropriate staff training. Consistent diversion from inbound material and the demanufacturing area to the reuse program is proceeding satisfactorily. Material testing, cleaning, refurbishment, sales and packaging has begun with processes being continuously evaluated and improved as the program matures. All material weights are being recorded as it comes into and out of the reuse area. Enhanced material value and marketability from reuse is evaluated on an ongoing basis.	Ahmad, Omar	2/28/2015	2/17/2015
Objective No.: 118 (4)					

Waste Commission of Scott County — 2015 Action Plan
List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
1	Research data erasing companies, tour other resue facilites and obtain quotes	Two site visits to PCR rebuilders and Dynamic recycling took place researching their reuse business plans and their data destruction. We were able to narrow providers for data erasing down to 3 vendors based upon site visits and research. Quotes for a data erasing system, including hardware, soft, licenses, and tech assistance were obtained. Tabernus is the selected system.	Stalcup, Bryce	3/21/2014	3/21/2014
2	Order data erasing system and create procedures.	Procedrues are in the process of being drafted and the Tabernes software/hardware was ordered at set for delivery 7-14-14	Ahmad, Omar	6/30/2014	6/30/2014
3	Install data erasing system	The data errassing system from Tabernus was installed and trained upon over a web conference. Over the course of the next few months procedures will be updated and implemented to reflect this new process and full time data wiping of eligible hardrives will begin.	Ahmad, Omar	7/31/2014	7/29/2014
4	Evalutate data erasing system	Procedures for wiping and auditing hard drives have been completed and implemented. Involved staff have been trained on the use and maintenance of the Tabernus system and auditing equipment. The Tabernus system has been analyzed after thorough use and satisfies the needs of the data security program including reliability and data logging.	Ahmad, Omar	9/30/2014	12/15/2014
Objective No.: 119					
1	Research whats makes a successfull safety committee.	Research was conducted through internet research and advice from our workers comp insurance provider.	Stalcup, Bryce	2/28/2014	2/28/2014
2	Create a safety committee procedure and select memebers	A safety committee procedure was created and uploaded to intelx. The first group of members consist of volunteers from each facility. Members will serve 6 months. All staff except for higher management will participate on the safety committee.	Stalcup, Bryce	4/1/2014	3/31/2014

Waste Commission of Scott County — 2015 Action Plan
List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
3	Hold first safety committee meeting	We held the first safety committee meeting, appointed a chair and discussed the future goals and tasks of the safety committee.	Stalcup, Bryce	4/30/2014	4/16/2014
4	Evaluate safety committees work since implementation.	When the safety Committee first started in April we set 3 goals. 1. Meet every month, 2. Conduct 100% review and response to incidents regarding safety, and 3. conduct 100% of required training. All of these goals have been met as of 12-31-2014. The Safety Committee has also implemented: monthly safety committee messages/gift reminders, further training, committee involvement safety plan and policy review, accident evaluation and response with recommendations, and much more. See safety committee meeting minutes.	Stalcup, Bryce	12/31/2014	12/31/2014

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List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
Objective No.: 121					
1	Research ways to minimize the impact to natural resources when handling HHM waste	The following is a list of way to minimize the impact to natural resources when handling HHM waste: 1. Come up with a plan to produce less waste when processing HHM material - research recycling outlets, 2. Look into bulking latex paint for solidification and recycling the metal cans, 3. Change our current process for mangaing the waste that is produced within the HHM. 4. Look at the way we haul bad paint from site to site.	Croegaert, Ryan	11/28/2014	11/28/2014
2	Pilot the new ideas and determine what should be implemented	We piloted bulking all good and bad latex paint and recycling the metal cans. We quickly found out that this is manageable through our slower time in the winter but unattainable through the majority of the year when we are very busy. We decided to process bad paint following our old techniques and to continue bulking more good paint as it comes in. Another project we decided to take on was putting a seal in the roll off of bad paint. We noticed this box would have a tendency to leak paint and when it would site it had the possibility of leaking paint into storm water.	Croegaert, Ryan	4/30/2015	4/30/2015
3	Implement the changes.	We decided to implement the bulking of more good paint as it comes through our door. Doing this we have recycled 1800 lbs of metal on top of our normal production. We also implemented a seal in our roll off box for bad latex paint. Putting in a seal stops any free paint in the box not allowing it to flow out and into ground water.	Stalcup, Bryce	6/30/2015	5/29/2015
Objective No.: 123					

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Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
1	Brainstorm ideas to enhance safety when loading and unloading the HHM trailer.	When looking at the operation of loading and unloading the HHM trailer it was evident that a way to minimize any safety concern would be to load and unload the trailer from the rear as much as possible rather than removing sides. The other thought is a box truck would be the safest and most efficient means of transporting HHM and electronic material.	Brothersen, Spencer	7/31/2014	7/29/2014

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List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
2	Implement changes and research purchase of a box truck.	While the purchase of a box truck is being evaluated staff began loading and unloading the HHM trailer from the back instead of removing all of the sides making the operation much safer. It was determined that a box truck was an avenue we wanted to follow and could be completed with a grant through the Iowa EMS.	Stalcup, Bryce	9/30/2014	9/30/2014
3	Submit grant application to Iowa EMS board for approval for a new box truck.	The grant application was completed and turned into the state. Once approval is given a truck will be selected and purchased.	Stalcup, Bryce	10/31/2014	10/31/2014
4	Evaluate the effectiveness of the change in relation to the number of customers serviced and the safety risks averted.	The purchase of the box truck is a huge asset to the HHM and Ewaste programs. The truck loads and unloads with ease. There is no longer heavy lifting of trailer sides involved. Everything can be unloaded using fork trucks and pallet jacks making the process much safer and quicker. In terms of collection and management of material, early numbers indicate that use of the truck has allowed us to serve more customers in 2015 than 2014, although certainly other factors also impact customer count. Despite a larger number of customers served, weight of material collected has actually decreased, which may indicate that ongoing customers don't have as much material to dispose of when we provide collection on a more regularly scheduled basis. Again, however, numbers of customers served and amount of material collected is impacted by several factors, both internal and external. (March-June 2014 customers served: 30, pounds collected: 50,539; March-June 2015 customers served: 32, pounds collected: 38,639) In summary, given that we are serving more customers with the truck than without, we believe the truck to be an excellent investment, especially in light of the added safety that it provides, which is much more difficult to quantify.	Stalcup, Bryce	6/30/2015	5/26/2015

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List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
5	Purchase the new box truck/supplies and implement the use.	A box truck and supplies was purchased and we have begun using it for HHM/ewaste services.	Stalcup, Bryce	4/30/2015	4/30/2015
Objective No.: 124					
1	Create an annual content calendar for all strategic messaging.	Created an annual content calendar that includes maintenance, priority, and other messaging, including seasonal messaging. HHM is a focus of the calendar.	Welvaert, Brandy	12/30/2013	12/30/2013
2	Create key points for all HHM messages based upon survey results.	Key points for all HHM messages were created. Messages will focus on the following: Educate about what household hazardous materials are; educate about the proper way to dispose of them; educate about using the appointment system; focus on the ease of using the program for residents.	Welvaert, Brandy	1/15/2014	1/15/2014
3	Create and place :15 HHM radio commercial.	Created :15 HHM radio commercial and purchased time for the year (2014) through Clearchannel and Cumulus/Townsquare media channels to place the HHM message. Stations include 97X, B100, and WLLR. Stations whose demographics skew slightly male were selected.	Welvaert, Brandy	1/30/2014	1/30/2014
4	Contract with outside firm to create new :30 HHM commercial; create and place commercial.	Contracted with MotionSix Creative to produce one :30 HHM commercial. Collaborate with Kurt Liske and Matt Bishop (MotionSix) to prepare the script, develop a consistent design and feel to be used across all commercials (including an audible tagline), and complete the commercial for airing. Commercial placement is on an annual basis with KWQC-TV6. The HHM commercial also was placed with WQAD and KGCW in April and May.	Welvaert, Brandy	1/30/2014	1/30/2014
5	Create two digital ads for placement on the QC Times Extended Reach Network.	Created two digital ads for placement on the QC Times Extended Reach Network (187,000 ads per month). (Two ads are for A/B testing, which will determine future ad copy and layout.)	Welvaert, Brandy	3/14/2014	3/14/2014

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Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
6	Create annual social media calendar with focus on maintenance messages.	Created annual social media calendar with focus on HHM. Also created corresponding Outlook reminders for Brandy Welvaert and Kurt Liske for scheduling all maintenance, priority messages at least one month in advance via Facebook. At least 52 posts about HHM will be made to the WCSC Facebook page per year (Brandy), and at least one video blog post and four timelapse videos will focus on HHM (Kurt).	Welvaert, Brandy	1/3/2014	1/3/2014
7	Create and send quarterly newsletter with HHM feature.	Newsletter completed.	Welvaert, Brandy	6/13/2014	6/13/2014
8	Track metrics and evaluate effectiveness of campaign after one year.	Over a one year period (Jan. 1, 2014-Jan. 1, 2015), the Commission saw a 5% increase in scheduled versus non-scheduled appointments. Over the same time period, the Commission saw a 2% increase in residents served by its HHM program. Because the goal was met, the campaign is deemed successful and will continue in 2015 with minor changes based upon changes in technology and media consumption. For example, some digital ads will be mobile banners, and commercials will be placed not only on broadcast stations, but also on stations targeting the 18-34 demographic via Mediacom/OnMedia.	Welvaert, Brandy	1/1/2015	1/1/2015
9	Track metrics and evaluate effectiveness of campaign after second year.		Welvaert, Brandy	1/8/2016	
Objective No.: 125					
1	Create an annual content calendar for all strategic messaging.	Created an annual content calendar that includes maintenance, priority, and other messaging, including seasonal messaging. E-waste is a focus of the calendar.	Welvaert, Brandy	12/30/2013	12/30/2013

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List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
2	Create annual social media calendar with focus on maintenance messages.	Created annual social media calendar with focus on HHM. Also created corresponding Outlook reminders for Brandy Welvaert and Kurt Liske for scheduling all maintenance, priority messages at least one month in advance via Facebook. At least 52 posts about e-waste will be made to the WCSC Facebook page per year (Brandy), and at least one video blog post and four timelapse videos will focus on e-waste (Kurt).	Welvaert, Brandy	1/3/2014	1/3/2014
3	Create key points for all e-waste messages based upon survey results.	Key points for all e-waste messages were created. Messages will focus on the following: Educate about what e-waste is; educate about the proper way to dispose of it; educate about data security; focus on the ease of using the program for residents (e.g. no appointment necessary).	Welvaert, Brandy	1/15/2014	1/15/2014
4	Contract with outside firm to create new :30 e-waste commercial; create and place commercial.	Contracted with MotionSix Creative to produce one :30 e-waste commercial. Collaborate with Kurt Liske and Matt Bishop (MotionSix) to prepare the script, develop a consistent design and feel to be used across all commercials (including an audible tagline), and complete the commercial for airing. Commercial placement is on an annual basis with KWQC-TV6.	Welvaert, Brandy	1/30/2014	1/30/2014
5	Create and place :15 e-waste radio commercial.	Created :15 e-waste radio commercial and purchased time for the year (2014) through Clearchannel and Cumulus/Townsquare media channels to place the HHM message. Stations include 97X, B100 and Mix96. (Mix96 is the 24-hour holiday music station in November/December, so the e-waste message fit given the seasonal nature of electronics purchases.)	Welvaert, Brandy	12/13/2013	12/13/2013
6	Create two digital ads for placement on the QC Times Extended Reach Network.	Created two digital ads for placement on the QC Times Extended Reach Network (187,000 ads per month). (Two ads are for A/B testing, which will determine future ad copy and layout.)	Welvaert, Brandy	11/21/2013	11/21/2013

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List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
7	Create and send quarterly newsletter with e-waste feature.	Created and sent quarterly newsletter (December) with e-waste feature to approximately 1, 500 recipients.	Welvaert, Brandy	12/10/2013	12/10/2013
8	Track metrics and evaluate effectiveness of campaign after one year.	Residential walk-in customers to the facility increased over 14 percent in 2014 (9,681) over 2013 (8,591), representing an additional 1,100 customers, or about 21 per week.	Welvaert, Brandy	1/9/2015	1/6/2015
9	Track metrics and evaluate effectiveness of campaign after second year.		Welvaert, Brandy	1/8/2016	
Objective No.: 128					
1	Purchase new rolling carts and additional containers to increase inventory and better serve coinciding events.	Purchased 6 Clearstream carts and 40 event recycling containers in July 2013, bringing total inventory to 8 carts (6 new, 2 old) and 121 blue containers.	Webinger, Paula	2/1/2014	7/31/2013
2	Improve the event recycling trailer to make it more user-friendly and more durable	The interior was sheeted with ¾ inch plywood all around. Ratchet tracking was installed and ratchet straps were purchased to keep the carts from moving. A small storage compartment was built in the front of the trailer to store bags, sign racks and cleaning supplies. A wheel was placed on the trailer jack and wheel chocks were purchased to prevent the trailer from rolling away.	Briggs, Brian	3/1/2014	2/18/2014
3	Revise Event Recycling Procedures and Forms to ensure excellent customer service for program participants and prompt return of containers	Policies were written for events using less than 20 containers and events using the event recycling trailer. Step-by-step guidelines were created and placed in a binder at EDF. New fillable forms were created to make program guidelines clear to participants.	Webinger, Paula	7/1/2014	1/1/2014
4	Promote the event recycling program through Websites and social media	Included in e-newsletter June 2, 2014. Created billboard for Waste Commission Website June 6, 2014. Promoted program on iLivehere Facebook page in June, July and August with 12 scheduled posts (June 9, 18, 27, 30; July 3, 10, 15, 24, 31; and Aug. 6, 12, 18, and 19, 2014). Promoted program on Waste Commission Facebook page in June, July and August with 6 scheduled posts (June 18 & 25, July 6 & 23, and Aug. 6 & 20, 2014).	Welvaert, Brandy	9/1/2014	8/20/2014

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Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
Objective No.: 129					
1	Work with engineer on design and approval through IDNR	worked with Barker Lemar on sizing and design of the electric pump. Also received authorization from IDNR to install system	Seals, Brian	7/1/2013	7/1/2014
2	Install pump and piping to infiltration basin and recirculation piping. Submit proper documentation to IDNR for construction approval	This is still in progress. We have installed the electric pump and piping to the infiltration basin, but are still working on installing the piping to the leachate recirculation lines that we want to recirc. to. Submittal of the documentation to IDNR has occurred and been approved for the completed portions.	Moore, Nolan	11/30/2013	11/29/2013
3	Winterize pump lines and valves to allow use during winter.	winterization did take place. Power was limited to ALL of these locations; hay bales were used and worked until we reached really cold temperatures	Peekenschneider, Eric	11/14/2014	10/29/2014
4	Create seasonal access to Recirculation lines: 2,3,5,6,9,10,11,12,16,18	Seasonal access was created, not permanent but could be used until weather got cold. This access will be used whenever weather allows	Peekenschneider, Eric	11/14/2014	11/14/2014
5	Create all weather access by trenching in recirculation lines: 19-24	trenching and pipe installation took place along with a manifold and valve system to control flow to each line 19-24	Peekenschneider, Eric	11/14/2014	11/14/2014
6	research SCADA automation options for pump cycle times and line capacity along with automated reporting		Seals, Brian	12/31/2015	
7	Create a flow chart of steps (reference manual) for each recirculation pipes. This will include line capacity, valves that have to be open, labeling of those valves, and SCADA procedures		Peekenschneider, Eric	9/2/2015	
8	Evaluate options to tie automation of pump/piping into basins 2 & 3.	Evaluation did happen, but after finding out the ineffectiveness of the basins, we did not move forward with installation of piping to the basins.	Seals, Brian	4/1/2015	4/1/2015

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Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
9	Progress Notes	We have made some great improvements to the system and will continue to research ways to improve it even more. From Jan 1 - June 30 we have sent 483,085 gallons through automated recirculation and have trucked 354,526 gallons. At the end of the calendar year we will have a full evaluation of 2015 vs. 2014 and will be able to share fuel savings and staff time savings. As a reference in 2014 we hauled 1,352,188 gallons and sent 491,070 through automated recirculation.	Seals, Brian	1/1/2016	

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List of EMPs by Objective

Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
Objective No.: 130					
1	Gauge interest of special waste customers for this service and clarify their water needs (PSI & GPM)	Our three largest special waste customers were definitely interested in the service. We also figured out what their needs are for PSI and GPM	Stalcup, Bryce	10/31/2013	10/31/2013
2	research manufacturers that make hydroseeders and put out an RFP	Completed research, put out RFP, received/reviewed proposals.	Seals, Brian	12/31/2013	12/24/2013
3	Train special waste customers on how to use the hydroseeder for their wash out needs and begin use	Set up individual meetings/training sessions with our special waste customers. They have began use of the hydroseeder.	Moore, Nolan	6/16/2014	6/16/2014
4	Quantify results of hydroseeder uses.		Seals, Brian	10/30/2015	
5	Survey special waste customers to see what improvements can be made to the program/machine	Special Waste customers are very happy with the wash out system. Throughout the implementation we were offered feedback which led to changes in nozzels and the way we fill the holding tank. We are currently evaluating our cost and what we price each wash out at.	Stalcup, Bryce	12/19/2014	12/18/2014
6	Research flow meter and presure gauge options	Because the hydroseeder has such a high GPM and pressure a flow meter is very cost prohibitive (\$10k) so we did not move forward with measuring how many gallons special waste vehicles were using each visit.	Seals, Brian	11/28/2014	11/15/2014
7	Run reports and evaluate pricing structure for service	WCSC group looked at reports and did talked with our special waste customers and decided to lower pricing \$25/use. We were hoping based off of feedback this would increase the number of times customers use the wash out program	Seals, Brian	12/19/2014	12/19/2014
8	Create a back up clean out system for customers if pump is down for maintenance	A back up system was created, but was not effective enough for a reliable backup. A different back up system is in the works and will be complete by 9-30-15.	Moore, Nolan	2/27/2015	2/27/2015
9	Progress Notes	Mechanical issues and so many customers changing valve settings has made the hydroseeder not as reliable as really wanted. Commission staff has been working through these issues and will hope to reestablish reliability with customer base	Seals, Brian	11/20/2015	

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Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
Objective No.: 131					
1	Research litter vacuums and litter fencing designs and netting options.	There are a lot of options for litter vacuums. They range in price from \$2000 - \$60,000. There are about 5 reputable firms with great litter fencing designs and pricing ranging from \$3000 to \$8000. Netting has so many options I stopped research. Pricing varied from .20/ft to \$100/ft.	Seals, Brian	11/29/2013	11/11/2013
2	Order litter vacuum, work with local fabrication shop on own litter fence design, order fabrication metal for our own litter fence modifications, and order netting.	We ended up purchasing a Billy Goat debris vacuum and mounting it onto a trailer. We built a collection box for the vacuum to shoot the litter into. A local fabrication shop and I worked together to design a litter fence that would meet our needs and keep our costs low. The designs of the litter fence allows the operator to pick up the litter fence with the blade of the dozer. We had built for \$3000 and similar designs on the market were around \$5000. Material was ordered to modify the 13 current litter fences. We pulled them up to the shop and made long term modifications and put new litter netting on them.	Seals, Brian	12/31/2013	2/21/2014
3	Construct another 100 foot of litter fence. we will be changing the design to have it slope forward. This will hopefully catch more litter and not have it blow over the straight up and down previous design.		Seals, Brian	7/1/2015	
4	Build inventory of utility poles for permanent litter fencing when elevation of 800ft is met		Seals, Brian	2/1/2017	
Objective No.: 132					
1	Create key points for all recycling messages based upon survey results.	Key points for all recycling messages were created. Messages will include a general reminder about recycling and, where possible and/or appropriate, mention drop-off recycling as an option.	Welvaert, Brandy	1/15/2014	1/15/2014
2	Create an annual content calendar for all strategic messaging.	Created an annual content calendar that includes maintenance, priority, and other messaging, including seasonal messaging. Recycling is a focus of the calendar.	Welvaert, Brandy	12/30/2013	12/30/2013

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Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
3	Create annual social media calendar with focus on maintenance messages.	Created annual social media calendar with focus on recycling. Also created corresponding Outlook reminders for Brandy Welvaert and Kurt Liske for scheduling all maintenance, priority messages at least one month in advance via Facebook. At least 52 posts about recycling will be made to the WCSC Facebook page per year (Brandy), and at least one video blog post and four timelapse videos will focus on recycling (Kurt).	Welvaert, Brandy	1/3/2014	1/3/2014
4	Create key points for all recycling messages based upon survey results.	Key points for all recycling messages were created. Messages will include a general reminder about recycling and, where possible and/or appropriate, mention drop-off recycling as an option.	Welvaert, Brandy	1/15/2014	1/15/2014
5	Contract with outside firm to create new :30 recycling commercial; create and place commercial.	Contracted with MotionSix Creative to produce one :30 recycling commercial. Collaborate with Kurt Liske and Matt Bishop (MotionSix) to prepare the script, develop a consistent design and feel to be used across all commercials (including an audible tagline), and complete the commercial for airing.	Welvaert, Brandy	1/30/2014	1/30/2014
6	Create and place :15 recycling radio commercial	Created :15 recycling radio commercial and purchased time for the year (2014) through Clearchannel and Cumulus/Townsquare media channels to place the recycling message. Stations include KISS, WLLR, 97X and 104.9 The Hawk.	Welvaert, Brandy	3/1/2014	3/1/2014

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Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
7	Track metrics and evaluate effectiveness of campaign after one year.	According to US Census data, there are 67,049 households and 170,385 residents in Scott County; therefore, a majority would be represented by 34,145 households or 86,896 individuals. In the 2013-2014 period, the Commission's marketing and communication program for recycling included 300,000 digital impressions, 800 TV commercials, and 508 radio spots, as well as ongoing communication with an audience of 1,500 (email database) and 1,400 (Facebook). In addition, the Commission mailed its semi-annual educational pieces (recycling calendars and reminders) to 54,800 residents in Daveport and Bettendorf. While the Commission clearly reached its goal in terms of reaching residents with the recycling message, inbound recycling tonnages do not present a clear picture about the campaign's affect on recycling behaviors. Shipped tons of recyclables continue to slip by about 4 percent per year, which is partially a reflection of lightweighting. This decrease also may reflect manufacturer packaging changes from plastics in the #1 and #2 category (currently accepted by the SARC) to those in the #3-#7 categories (not currently accepted, but anticipated to be accepted following the upcoming conversion to single-stream recycling.)	Welvaert, Brandy	1/1/2015	1/6/2015
8	Track metrics and evaluate effectiveness of campaign after second year.		Welvaert, Brandy	1/8/2016	
Objective No.: 133					
1	Prepare request for proposal for single stream recycling processing.	Waste Commission of Scott County released a request for proposals (RFP) for single-stream recycling processing on Jan. 27, 2014.	Morris, Kathy	1/27/2014	1/24/2014
2	Receive proposals and evaluate.	Completed review of proposals and prepared presentation for Executive Committee and Commission.	Morris, Kathy	6/19/2014	6/13/2014

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Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
3	Prepare recommendation on single stream recycling for Commission consideration.	The recommendation on single stream was prepared and included in the August 21st, 2014 Commission agenda. The Commission approved the recommendation.	Morris, Kathy	8/15/2014	8/14/2014
Objective No.: 134					
1	Facilitate discussion about possible ways to stop loss of recyclables as trash	MRF staff discussed ideas that could help capture recyclables currently being lost and reduce waste at the MRF. Ideas included enhanced intra-facility communication, training for contracted sorting staff, and enhanced signage at sorting stations. Staff was given direction for when and how to re-sort trash following visual inspection of trash receptacles located at the end of sorting belts.	Liske, Kurt	3/31/2014	3/26/2014
2	Gather safety, maintenance, and communication checklist items from MRF staff	MRF operations staff created lists of maintenance tasks and cleaning tasks that need to happen on a regular basis. Staff also created lists of safety information and basic facility information that needs to be communicated with contracted employees. Some of this information was pulled into training tools for contracted (HDC) staff; other information was pulled into new daily/weekly/monthly checklists to be used by MRF staff to facilitate operations.	Krambeck, Keith	4/30/2014	4/15/2014
3	Review HDC contract	Reviewed HDC contract to ensure roles and responsibilities are communicated effectively in all training components in development.	Welvaert, Brandy	5/30/2014	5/5/2014
4	Complete extensive MRF equipment maintenance	Complete two weeks' extensive equipment maintenance to enhance equipment function and thereby ensure that the process can capture the maximum amount of recyclable material.	Krambeck, Keith	7/25/2014	7/3/2014

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Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
5	Create new training tools for HDC supervisors & crew members	Worked with Kathy and Keith, pulling information from lists provided by operations staff, to create two PowerPoint presentations to be used as a visual and print training tool for contracted sorters and supervisors. Presentations include basic facility information, sorting how-to, operational rules and expectations, and clear division of responsibilities.	Welvaert, Brandy	7/31/2014	7/31/2014
6	Create new signage for sorting lines/stations	Created new signage for each station on the commingle sorting line to help staff correctly identify and sort recyclable materials.	Liske, Kurt	4/30/2014	4/15/2014
7	Conduct training sessions with HDC administration and staff	Conducted training session with HDC administration and crew supervisor on Sept. 17, 2014. Conducted training session with HDC crew on Oct. 2, 2014.	Krambeck, Keith	10/30/2014	10/2/2014
Objective No.: 136					
1	Form a Bike Trail Recycling committee and develop a plan	A meeting was called to discuss the project and develop a budget. Committee members include Brian Stineman, Todd Jones, Betsy Tubbs and Scott Hock, City of Davenport; Steve Grimes and Todd Voelliger, City of Bettendorf; Kathy Morris, Brandy Welvaert and Paula Webinger, Waste Commission of Scott County.	Morris, Kathy	6/18/2014	6/18/2014
2	Write and receive a SWAP grant	Waste Commission of Scott County submitted a SWAP grant to the July 2014 round. A notification of acceptance was received 8/6/14, although a signed agreement from DNR was not received until 9/24/14.	Morris, Kathy	9/15/2014	9/24/2014
3	Order 45 trash and recycling stations for City of Davenport and City of Bettendorf to install	One container was ordered 5/11/15 from Recycle Away for the cities to try out. 44 additional containers were ordered 6/17/15.	Webinger, Paula	6/30/2015	6/17/2015
4	provide education to trail users about proper disposal and recycling		Welvaert, Brandy	9/1/2015	
5	record recyclables received at the Scott Area Recycling Center		Webinger, Paula	10/15/2015	
6	Continuously improve the program		Webinger, Paula	10/30/2015	

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Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
Objective No.: 139					
1	Commission approval of single stream implementation.	Commission approved recommendation to implement single stream recycling.	Morris, Kathy	6/25/2015	6/25/2015
2	presentation to board of Supervisors to secure commitment for single stream equipment and building modifications.		Morris, Kathy	8/14/2015	
3	Present single stream implementation plan to all Commission member entities.		Morris, Kathy	11/30/2015	
4	Procurement of single stream carts.		Morris, Kathy	12/30/2015	
5	Procurement of contractor for single stream equipment.		Morris, Kathy	10/1/2015	
6	Procurement of contractor for building modifications.		Morris, Kathy	10/1/2015	
7	Procurement for single stream processing during construction.		Morris, Kathy	10/15/2015	
8	work with Scott County to complete bonding process.		Morris, Kathy	12/31/2015	
9	Finalize Closed Loop loan for carts		Morris, Kathy	8/30/2015	

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Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
10	Progress notes	<p>The Commission Management Team in coordination with Executive, Finance and Staff Coordinating Committee completed the following single stream implementation tasks:</p> <ul style="list-style-type: none"> •Support resolutions were received from East Moline, Moline, Rock Island and the Rock Island County Waste Management Agency. •Development of a recycling processing and marketing agreement to secure additional tonnage. A signed agreement was secured from Midland-Davis. •Financing options were determined to be general obligation bonding for single stream equipment and building modifications, 10 year, interest free loan from Closed Loop Fund for carts and preparation of SWAP grants for single stream education and campaign roll out. •Development of a market volatility fund and consideration of a debt reserve fund during the bond life. •Confirmation of costs associated with capital improvement needs for building modifications and single stream equipment, including evaluation of current bid market climate. •Completion of the impact to the Commission's overall 20 year life cycle cost analysis for all facilities and services. •Development of a detailed schedule for implementing the single stream collection and processing program with a projected start date of July 11, 2016. A recommendation to proceed was approved by the Commission at their June 25th, 2015 meeting. 	Morris, Kathy	6/30/2015	6/30/2015
Objective No.: 140					

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Record No.	EMP Description	Completion Notes	Person Responsible	Target Date	Completion Date
1	Follow Landfill Methane Production bill (House File 244)	House File 244 was signed into law. The bill adds a fourth exception to allow for the disposal of yard waste in a sanitary landfill when the sanitary landfill operates a methane collection system that produces energy. Because Scott Area Landfill collects methane for energy, the bill impacts the lawful operation of the landfill and potentially creates the opportunity to accept yard waste at the facility.	Morris, Kathy	7/30/2015	6/15/2015
2	Evaluate potential internal opportunities and risks of accepting yard waste at the Scott Area Landfill		Morris, Kathy	10/30/2015	
3	Share internal evaluation with 28E partners and discuss the potential for further holistic evaluation of yard waste management in Scott County		Morris, Kathy	12/30/2015	
4	Tentative: Select and contract with an outside firm to study current yard waste disposal practices and programs within Scott County and provide feedback for improvements based upon the waste hierarchy, potentially as they relate to changes in legislation.		Morris, Kathy	2/26/2016	
5	Tentative: Share results of yard waste study with 28E partners and make recommendations for changes in materials management, as needed; reach consensus among partners		Morris, Kathy	3/30/2016	
6	Tentative: Develop new standard procedures for managing new materials at facilities; train staff		Seals, Brian	5/27/2016	
7	Tentative: Discuss educational messaging to reflect changes in materials management. Make recommendations for maintenance messages; reach consensus with partners on education and implement		Welvaert, Brandy	6/24/2016	
8	Tentative: Evaluate program changes and document environmental metrics.		Liske, Kurt	12/30/2016	
9	Tentative: Develop environmental metrics by which to evaluate effectiveness of program changes		Liske, Kurt	6/1/2016	

2015 EMS Annual Report: Waste Commission of Scott County Attachment 7

Summary: The Commission's Core Team meets once per month and reviews, among other agenda items, updates to EMS Objectives & Targets. In addition, the Commission uses Intelex, an online EMS database, to manage documents, requirements, tasks, and programs. Intelex provides reminders to staff members directly to their e-mail inboxes when documents, requirements, tasks and program require regularly scheduled review or other attention. Through Core Team meetings and use of Intelex functions, the Commission ensures annual review of all 10 elements of the Iowa EMS. Core Team minutes are attached.

2015 EMS Annual Report: Waste Commission of Scott County Attachments A-I

Summary: With the exception of Attachment C, which follows, the Commission previously has submitted the most updated versions of these required documents to the Iowa DNR; therefore, they are not included in this report.

2015 EMS Annual Report: Waste Commission of Scott County Attachment C

Summary: The Commission is working toward implementing single-stream recycling by July 2016. Currently the Commission operates a dual-stream recycling facility, and many changes will happen as a result of the transition. Potential Environmental Aspects and Impacts stemming from these changes will be evaluated appropriately according to the Commission's procedure.

2015 EMS Annual Report: Waste Commission of Scott County
Attachment J: Internal Audit



Environmental, Health & Safety
Management System (EHSMS)



2015 Internal Audit Plan

Document Number: 01433	Issue Date: 03/02/2015	Revision Number: 1	Prepared By: Carlstrom, Carrie	Approved By: <i>Kathy Morris</i>
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Integrated & Process-Based Internal Audit Plan
R2:2013, OHSAS 18001:2007, ISO 14001:2004 & Iowa EMS

Auditee Name: Waste Commission of Scott County; Electronic Demanufacturing Facility

Facility Representation: Kathy Morris, Keith Krambeck, Bryce Stalcup, Omar Ahmad, Brian Briggs and Kurt Liske

Audit dates: February 23, 24 and 25, 2015

Co-auditors: Carrie Carlstrom and Brandy Welvaert

Audit Scope: Three-day audit of Waste Commission of Scott County Facilities

Audit Objectives: To assess the adequacy, effectiveness and conformance of the Electronic Demanufacturing Facility to the R2:2013, OHSAS 18001:2007, ISO 14001:2004 and Iowa EMS standards; and of other Waste Commission of Scott County Facilities to Iowa EMS standards, by reviewing the extent to which:

- The organization adheres to its own policies and procedures;
- The organization follows requirements set forth by the above named standards;
- The organization is effectively achieving its own objectives;
- Documents meet the guidelines outlined in the above named standards; and
- Objective evidence of continuous improvement is presented.

Reference Documents: The audit will be conducted in accordance with the following:

- R2:2013 Standard
- OHSAS 18001: 2007
- ISO 14001: 2004
- ISO 19011: 2011
- Iowa 2008 Legislation, House File 2570



Environmental, Health & Safety
Management System (EHSMS)



2015 Internal Audit Plan

Document Number: 01433	Issue Date: 03/02/2015	Revision Number: 1	Prepared By: Carlstrom, Carrie	Approved By: <i>Carrie Morris</i>
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Integrated & Process-Based Internal Audit Plan
R2:2013, OHSAS 18001:2007, ISO 14001:2004 & Iowa EMS

February 23, 2014			
Time	Process	Auditors	Auditee
7:30 a.m. (MRF Ed)	Opening Meeting	Carlstrom, Welvaert	EMR
8 a.m. (MRF Ed)	Review NCRs	Carlstrom, Welvaert	
8:30 a.m. (MRF Ed Room)	Document & pre-interview review	Carlstrom, Welvaert	R2 team, as needed
Noon (MRF Ed)	Lunch		
12:30-4 p.m. (MRF Ed)	Document review & pre-interview review	Carlstrom, Welvaert	R2 team, as needed

February 24, 2015			
Time	Process	Auditors	Auditee
7:30 a.m. (EDF Conf.)	Document review & pre-interview review	Carlstrom, Welvaert	R2 team, as needed
Noon	Lunch	Carlstrom, Welvaert	
12:30-4 p.m. (EDF Conf.)	Document review & audit trail development	Carlstrom, Welvaert	R2 team, as needed

February 25, 2015			
Time	Process	Auditors	Auditee
7:30 a.m. (LF)	Staff interviews	Carlstrom, Welvaert	R2 team, as needed
10 a.m. (transit)	Drive from LF to EDF	Carlstrom, Welvaert	
10:30 a.m.	Facility walk-through & staff interviews	Carrie Carlstrom, Brandy Welvaert	Applicable staff as needed
1 p.m.	Lunch	Carlstrom, Welvaert	
1:30-3:45 p.m. (EDF)	Evidence Review	Carlstrom, Welvaert	Applicable staff as needed
3:45-4 p.m. (EDF Conf.)	Review of findings and closing meeting	Carlstrom, Welvaert	EMR

Evidence review will be conducted following an integrated checklist of R2:2013, OHSAS 18001: 2007, ISO 14001: 2004, and Iowa EMS standards. All provisions will be visited and further investigation will be warranted where gaps are found during the audit process. A report of findings will be submitted to management in a timely manner.



Environmental, Health & Safety Management System (EMS)



Internal Audit 2015

Document No.: 01434	Revision No.: 1	Revised: 03/02/2015	Reviewed:	Prepared By: Carlstrom, Carrie	Approved By: <i>Atty Maria</i>
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Waste Commission of Scott County
2015 Internal Audit (Iowa EMS, R2: 2013, ISO 14001, and OHSAS 18001)

Waste Commission of Scott County established its EMS in 2008 and now is a designated Tier 2 participant in the Iowa EMS program, supervised by Iowa Department of Natural Resources, Solid Waste Division. In addition, the Commission’s Electronic Demanufacturing Facility was certified to the R2:2013, ISO 14001:20014 and OHSAS 18001:2007 standards in 2014. The facility initially was certified to R2:2008 in 2012.

The 2015 internal audit was conducted 7:30 a.m. to 4 p.m. over three days: February 23, 24, and 25, 2015. The 2015 audit plan includes the complete schedule.

The audit consisted of an integrated, process-based review of all the provisions and requirements of R2: 2013, ISO 14001, OHSAS 18001, and Iowa EMS as they relate to Waste Commission of Scott County facilities. It bears noting that the R2, ISO and OHSAS standards relate only to the Electronic Demanufacturing Facility, while the Iowa EMS covers all Commission facilities.

The audit included interviews with Special Waste Coordinator and Communications Specialist (co-EMRs), Special Waste Manager, Director, Facility Supervisor, Communication Coordinator, Administrative Assistant and several field staffers. Documents and other information pertaining to R2:2013, ISO 14001, OHSAS 18001, and Iowa EMS were reviewed.

The following general observations were made during the audit:

- During interviews with auditors, staff at all facilities demonstrated a strong and commendable understanding of the Commission’s EMS policy, and many staff members could speak in detail about each element of the PROTECT acronym. When asked to relate a current or ongoing project that they are working on to an element or elements of PROTECT, every staff member interviewed could do so.
- Also commendably, staff members at all facilities discussed their roles in objectives and targets, and they were able to talk about specific tasks they had completed to assist with an overall goal. They also were able to relate those tasks and/or projects back to PROTECT and talk about which part of the acronym was being carried out.
- The Electronic Demanufacturing Facility’s downstream due diligence for materials subject to the R2:2013 standard—including vendors for focus-materials, data-containing items, and other materials—is largely complete. However, at the time of the audit, the facility had incomplete and/or outdated vendor information for three vendors: Alter, Document Destruction and Recycling Services, and Veolia. It is suggested that the downstream process be streamlined using

new documents provided by SERI in late 2014 (e.g. Certified Recycler Checklist), and that an automated process be created and utilized, within Intellex, to help simplify the task of managing and maintaining updated vendor documents.

- In the last year, the Electronic Demanufacturing Facility has undertaken the onerous task of developing and implementing a Reuse Program. Staff performed months of research, which included visits to other facilities that currently practice wiping, hours of in-depth reading about the technological aspects of data destruction with various programs, and attendance at several industry seminars and workshops across the country, not to mention the development of procedural documents, operational processes, training programs, and more. Review of the resulting documents and processes showed conformance; however, in some cases, processes currently implemented need to be documented in procedures, plans and/or Intellex.

2015 Internal Integrated Audit Checklist:
R2:2013, OHSAS 18001:2007, ISO 14001:2004, IA EMS: HF 2570; In accordance with ISO 19011:2011

Team Member	? No.	Supporting Documents	Conforms/ Non-Conformance	Notes
Kathy	1	Does the recycler have a current licensing agreement with R2 Solutions? [R2 Code of Practices - Section VI]	Conforms	Yes, WCSC R2 Liscence Agreement, Doc. No. 01406
Kurt	2	Is the recycler following the Logo Usage Rules? [R2 Code of Practices - Section - VI]	Conforms	Yes, the Commission does follow R2's Logo Usage Rules: PJR's Pro# Logo Usage Doc. No. 01202 (eff. & rev. 6/25/14)
Brandy	10 (EMS)	How does the organization document internal and external communication in regard to the EHSMS? Is there a procedure?	Conforms	Yes, The Commission's Internal Communication Procedure, Doc. No. 00118, details internal communication via the Internal Communication Form, Doc. No. 00136, and the Incident Reporting (detailed later in this report). The Commission's External Communication Procedure, Doc. No. 00117, details usage of the External Inquiry Communication Form, Doc. No. 00137, and use of the Site Visitor Log with Contractor Confirmations, Doc. No. 01395, and the Environmental Health & Safety Guidelines & Responsibilities Brochure, Doc. No. 01404. Internal and external communications are received are tracked and followed in the Communication module of InteleX.
Keith	3	Are 100% of approved downstream vendors audited by the recycler? [R2 Code of Practices - Section V©(5)]	Non-Conformance	The Commission does have vendor audit packets for all downstream vendors, as described in its FM Mgmt. Plan, Doc. No. 00148. However, it was found that all 3 Veolia outlets had expired Certificate of Liability Insurance forms as of 1/1/15, and two of the facilities were noted as R2 certified, but were certified to R2:2008. It has been confirmed that two shipments were sent (dated 1/16/15 and 1/23/15). Since this was found, contact has been made with Veolia and the current documents shall be forthcoming. Republic Services (formally City Carton DDRS) vendor approval had expired on 1/23/15 and a shipment was sent 2/6/15. It bears noting that contact was made prior to the shipment, requesting the necessary documentation. Since this finding, all documents required for approval have been submitted by the vendor and updated in their audit packet. It was also found that Alter trading Corporation was missing security information from its audit package. Since this finding Alter has been contacted and the security information will be provided. [See also: Vendor Status Form Doc. No. 01012, Completed Vendor Verification Forms Doc. No. 01336 (w/audit packets)]

2015 Internal Integrated Audit Checklist:
R2:2013, OHSAS 18001:2007, ISO 14001:2004, IA EMS: HF 2570; In accordance with ISO 19011:2011

Kurt	4 (EMS)	How does the organization document the core elements of its EMS (10 Iowa EMS elements). Is there a procedure for each of the 10 elements? If there is not a procedure, how is the element otherwise covered?	Conforms	Environmental policy, Doc. No. 00141; Environmental, Health and Safety Aspects, Impacts and Significance Criteria Procedure, Doc. No. 00116; Legal & Other Requirements, Doc. No. 00119; - Objectives, Targets and Environmental Management Programs Procedure, Doc. No. 00121; EMS Manual, Doc. No. 00150; Roles and Responsibilities Matrix, Doc. No. 01352; Training, Awareness and Competency Communication, Doc. No. 00122; External Communication Procedure, Doc. No. 117; Internal Communication Procedure, Doc. No. 00118; 2014 Core Team Minutes, Doc. No. 01377; Documents and Records Management Procedure, Doc. No. 01005; EDF Operations Plan, Doc. No. 00151; Operational Control Procedure, Doc. No. 01382; ERRAP EDF, Doc. No. 00146, ERRAP LF, Doc. No. 01320, ERRAP MRF, Doc. No. 01321, ERRAP HHM, Doc. No. 01322; Monitoring and Measurement Procedure, Doc. No. 00120; Non-Conformance and Corrective Action Procedure, Doc. No. 01009; Documents and Records Management Procedure, Doc. No. 01005; Audits Procedure, Doc. No. 00131; Management Review Procedure, Doc. No. 01279
Kurt	4	Does the recycler have at least 3 months of records to verify conformance to the R2 Standard? [R2 Code of Practices – Section V(C)(5)]	Conforms	Yes, the Commission does have 3 months of records to verify conformance including, but not limited to: Core Team Mtg. Mins., Doc. No. 01377, various operational checklists (available upon request), and the Interaction of Processes, Doc. No. 01398. <i>Note: Core Team Mtg. Mins., Doc. No. 01377, should be updated to include 2015 (these documents are currently available by request in hard copy form).</i>
Kurt	5	Has the recycler documented the scope of activities included in the R2:2013 and EHSMS certifications, including any allowance to the R2:2013 standard expressly listed in the R2 Code of Practices? [section (a)]	Conforms	Yes, the scope for all certifications is documented in EMS Policy, Doc. No. 00141, with no allowances necessary.
Kathy	6	If an Allowance as specified in the R2 Code of Practices Section VII is being utilized, has it been authorized in writing by the recycler's Certification Body? [section (a)]	Not Applicable	No Allowances
Briggs	1c (EMS)	How does the organization manage control of outsourced and contracted services? How is this documented?	Conforms	Through security measures outlined in the EDF Ops Plan, Doc. No. 00151, and also through use of the Site Visitor Log with Contractor Confirmations, Doc. No. 01395, and the Environmental Health & Safety Guidelines & Responsibilities Brochure, Doc. No. 01404, as outlined in the External Communication Procedure, Doc. No. 00117.
Kurt	7	For R2:2013 Certified Recyclers: Has the recycler been continuously certified by an accredited Certification Body to either RIOS™; or both ISO 14001 and OHSAS 18001? [section (b)]	Conforms	Yes, the Commission has maintained certification by PJR to both ISO 14001 and OHSAS 18001 standards. Certificates are on display in the EDF Scale office, and in the EDF Facility Supervisor's office.

2015 Internal Integrated Audit Checklist:
R2:2013, OHSAS 18001:2007, ISO 14001:2004, IA EMS: HF 2570; In accordance with ISO 19011:2011

Kurt	8	For recyclers seeking R2:2013 Certification: Is the recycler currently certified by an accredited Certification Body to either RIOS™; or both ISO 14001 and OHSAS 18001, or will be certified prior to R2:2013 audits, or in a combined certification audit with R2:2013? [section (b)]	Conforms	See Q#7 above
Kurt	9	Has the recycler developed and documented a written EHSMS covering the activities in its approved scope? [section (c)]	Conforms	Yes, The Environmental Health & Safety Policy, Doc. No. 00141, defines the scope, and the EMS Manual, Doc. No. 00150, relates greater detail of the activities within the scope/fenceline.
Kurt	10	Has the recycler implemented the documented EHSMS with records to demonstrate execution of documented procedures? [section (c)]	Conforms	Yes, implementation is evident by the EMS Core Team Mtg Min, Doc. No. 01377, the completed operational checklists (available on request), the list of compliance activities performed and tracked in the Legal & Other module in Intelex under the Other tab, training records (available upon request), staff attendance of ToolBox Talks (agendas located in K drive, WCSC, Toolbox talk), and by audits performed (tracked in Intelex in the Audits module).
Kurt	11	Has the recycler updated controlled documentation in the EHSMS to reflect changes in operations, laws, products, technologies, vendors, etc.? [section (c)]	Conforms	Yes, the Commission's documents are controlled, housed, and tracked in the Intelex system in accordance with the Documents and Records Management Procedure, Doc. No. 01005. The EDF uses the New Product/ Operational Process Change Form, Doc. No. 01398, for assessment and implementation of new products received or processes implemented. The Commission's Legal and Other Requirements are managed and updated in the Intelex Legal & Other module. Vendor verification is managed as described in the FM Management, Doc. No. 00148.
Kurt	12	Does the EHSMS include written goals and procedures covering, and requiring the organization to systematically manage, its on-site and downstream environmental, health, safety, and data security matters in a manner consistent with each requirement of the R2:2013 Standard? [section (c)(1)]	Conforms	Yes, in accordance with the Commission's Aspects & Impacts Procedure, Doc. No. 00116, and scoring, the Objectives & Targets Procedure, Doc. No. 00121, was implemented and tracked through the Intelex, Objectives & Targets module.
Kurt	13	Does the EHSMS include a list of the activities necessary to conform to each requirement of R2:2013? For example, a mapping of controlled documents to each requirement of R2:2013. [section (c)(2)]	Conforms	Yes, in Intelex, in the Legal & Other Requirements module, under the Other tab, is where the list of activities performed for conformance to laws, regulations, and standards is managed. The Interaction of Processes, Doc. No. 01398, demonstrates the Plan-Do-Check-Act model the Commission's activities and documents follow.
Kurt	14	Does the EHSMS include a list of the documentation necessary to show conformity with these requirements? For example, a mapping of records to each requirement of R2:2013. [section (c)(2)]	Conforms	See Q#13 above

2015 Internal Integrated Audit Checklist:
R2:2013, OHSAS 18001:2007, ISO 14001:2004, IA EMS: HF 2570; In accordance with ISO 19011:2011

Kurt	15	Does the EHSMS include a commitment to take corrective action to address any issues of non-conformance? [section (c)(2)]	Conforms	Yes, the Non-Conformance and Corrective Action Procedure, Doc. No. 01009, outlines the Commission's commitment to investigate all non-conformances and implement corrective action as deemed necessary.
Kurt	16	Does the recycler have a written policy stating how it manages used and end-of-life electronic equipment, components, and materials, both on-site and by downstream vendors that is based on the hierarchy of responsible management strategies (Reuse > Recover > Dispose)? [section (a)]	Conforms	Yes, the Commission's EMS Policy, Doc. No. 00141, EDF Ops Plan, Doc. No. 00151, and the FM Management Plan, Doc. No. 00148, all clearly demonstrate its commitment to following the hierarchy of responsible management strategies.
Kurt	7a (EMS)	Has the organization identified strategic and measurable Objectives and Targets, and do these address preventative health and safety as well as data security, the six Iowa EMS elements? Are non-conformances evaluated as to whether an O&T is needed? (R2:2013 1(c)1)	Conforms	Yes, as per directed in the Objectives & Targets Procedure, Doc. No. 00121, the commission identified the following O & T's: Yard Waste: Rec. # 126 - Use online and print ads, social media, and events to reach at least 50,000 residents with a yard waste message. HHM: Rec. # 120 - Minimize the impact of our oil drop off area on the environment. Water Quality: Rec. # 131 - Increase efficiencies in controlling and collecting onsite litter. Greenhouse Gas: Rec. # 130 - Allow special waste contractors to utilize our hydroseeder to wash out their tankers. Recycling: Rec. # 128 - Increase the number of events utilizing the Event Recycling Program in 2014 by 10% over 2013. Environmental Education: Rec. # 132 - Create ongoing maintenance messaging campaign for recycling. Health & safety: Rec. # 123 - Improve staff safety when loading and unloading the HHM trailer. EDF objectives and targets include: Data security: Rec. # 118 - Expand data security program to include data wiping/auditing; Tracking system: Rec. #110: Design/implement new software tracking system; Safety Committee: Rec. #119: Create and implement Safety Committee; Data wiping: Rec. #118: Expand data security program to include data wiping and auditing.
Kurt	13a (EMS)	How do the organization's procedures ensure that it can measure performance and compliance proactively? (Continual improvement)	Conforms	The Objectives & Targets Procedure, Doc. No. 00121, and Monitoring & Measurement Procedure, Doc. No. 00120, work together to ensure that targets are measured in an observable metric.
Keith	17	Is the written policy for responsible management strategies consistent and inclusive of the Focus Materials Management Plan? [section (b)]	Conforms	Yes, as can be found in the EMS Policy, Doc No. 00141, and the FM Mgmt Plan, Doc No. 00148.
Keith	18	Does the recycler adhere to the written policy for responsible management strategies with the selection and usage of downstream vendors? [section (a)]	Conforms	Yes, Vendor Status Form, Doc. No. 01012, Completed Vendor Verification Form, Doc. No. 01336 (w/audit packets) can demonstrate this.

2015 Internal Integrated Audit Checklist:
R2:2013, OHSAS 18001:2007, ISO 14001:2004, IA EMS: HF 2570; In accordance with ISO 19011:2011

Omar	19	<u>Reuse</u> – Does the recycler take all practical steps to separate and direct products for reuse first (according to Provision 6) unless a customer directs otherwise? [section (a)(1)]	Conforms	Yes. Taken into consideration the knowledge base of staff to test and/or repair, available product markets, and facility space constraints, the material that goes through the reuse program is what is feasible at this time. The following documents outline the process: EMS Policy, Doc. No. 00141, Reuse Quick ID, Doc. No. 01412, EDF Ops Plan, Doc. No. 00151, Ops Training, Doc. No. 00142, and Quality Assurance, Doc. No. 01413.
Briggs	20	<u>Materials Recovery</u> – Does the recycler take all practical steps to separate the materials in equipment and components that are not directed to reuse or refurbishment and recover materials or direct them to properly-equipped materials recovery facilities? [section (a)(2)]	Conforms	Yes, as evident in the following documents: EMS Policy, Doc. No. 00141, EDF Ops Training, Doc. No. 00142, and EDF Ops Plan, Doc. No. 00151, Vendor Status Form, Doc. No. 01012, EDF Material Flowchart, Doc. No. 01027, and shipping records (available upon request)
Keith	21	<u>Energy Recovery or Land Disposal Prohibited</u> - Does the recycler not direct material to incineration, energy recovery, or land disposal facilities unless no reuse or recycling options are viable? (See Provision 5(d) for the relevant requirements.) [section (a)(3)]	Conforms	Yes, as can be found in the following documents: EMS Policy, Doc. No. 00141, FM Mgmt Plan, Doc. No. 00148, shipping documentation, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets).
Kurt	22	Has the recycler developed a legal compliance plan and included it as a section of its EHSMS? [section (a)]	Conforms	Yes, the Commission has developed and implemented the Legal & Other Procedure, Doc. No. 00119, and is managed and updated through the Legal & Other Requirements module of Intelex.
Keith	23	Does the legal compliance plan include all applicable environmental legal requirements? Examples: International regulations, national regulations, local laws, air pollution control, waste laws, etc. [section (a)]	Conforms	Yes. Legal & Other Procedure, Doc. No. 00119, list of laws, regulations, and standards in Legal & Other from Intelex, FM Mgmt Plan, Doc. No. 00148, and Data Security Procedure, Doc. No. 01007.
Bryce	24	Does the legal compliance plan include all applicable health and safety requirements? Examples: worker safety regulations, fire codes, building codes, etc. [section (a)]	Conforms	Yes. Legal & Other Procedure Doc. No. 00119, Intelex Legal & Other list from Intelex, Safety Policy, Doc. No. 00014, all safety plans available per Bryce (hot work, Doc. No. 01230, LO/TO, Doc. No. 01168, confined space, Doc. No. 1029)
Keith	25	Does the legal compliance plan include data security regulations? Examples include health information protection, financial information, personal identity information, etc. [section (a)]	Conforms	Yes, Legal & Other Procedure, Doc. No. 00119, Data Security Procedure, Doc. No. 01007, list of R2 Legal & Other from Intelex, (i.e. Sarbanes Oxley, HIPPA, etc.)

2015 Internal Integrated Audit Checklist:
R2:2013, OHSAS 18001:2007, ISO 14001:2004, IA EMS: HF 2570; In accordance with ISO 19011:2011

Keith	26	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? [section (a)]	Conforms	Yes, the Legal & Other Procedure, Doc. No. 00119, refers to the FM Mgmt Plan, Doc. No. 00148, to cover the legality of importing and exporting FM's.
Keith	27	Does the legal compliance plan cover the legality of exports and imports through all countries? [section (a)(2)]	Conforms	Yes. See Q#26 above
Keith	28	Does the legal compliance plan include imports/exports by downstream vendors? [section (a)(2)]	Conforms	Yes. See Q#26 above and Completed Vendor Verification Forms, Doc. No. 01336 (found w/ completed audit pkgs in binders).
Keith	29	Does the recycler have evidence that transit or destination countries were determined prior to shipment by the recycler or downstream vendors? [section (a)(2)]	Conforms	Yes. See Q#26 above and Completed Vendor Verification Forms, Doc. No. 01336 (found w/ completed audit pkgs in binders).
Keith	30	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? [section (a)(2)]	Conforms	Yes. See Q#26 above and Completed Vendor Verification Forms, Doc. No. 01336 (found w/ completed audit pkgs in binders).
Carrie	31	Does the recycler keep the legal compliance plan current? [section (a)(3)]	Conforms	Yes, following the procedure outlined in Legal & Other, Doc. No. 00119, all laws, regulations, and standards are kept current by annual reviews, at a minimum in the Intelx Legal & Other module. Next review due date is 9/1/15.
Kurt	32	Does the recycler identify and implement the steps necessary to comply with each requirement, and document the implementation of these steps? [section (a)(3)]	Conforms	Yes, the Legal & Other Procedure, Doc No. 00119, details the process of compliance. Compliance activities are managed in Intelx via the Legal & Other module, under the Other tab.
Kathy	33	Does the recycler periodically <u>audit</u> its compliance with applicable legal requirements? [section (a)(3)]	Conforms	Yes, as explained in the Audits Procedure, Doc. No. 00131, and in completed audits and compliance reviews uploaded to Intelx in the Audits module: Internal Audit #00036, Follow -up Int. Audit #00052, 3rd Party Compliance Review #00047, External Audit #00053, Non-Conformances/Corrective/Preventative actions in Non-Conformance and Corrective Action module in Intelx.
Kurt	20a (EMS)	Can the organization show its internal audit procedure, findings and fixes? Provide details.	Conforms	Yes, explained in the Audits Procedure, Doc. No. 00131. The Internal Audit #00036, and Follow Up Internal Audit #00052, in the Audits Intelx module, can verify the effectiveness of the internal audits performed, complete with findings and the corrective action taken, with completion dates.
Kurt	20b (EMS)	Does the organization's audit process meet ISO 14001 4.5.5?	Conforms	Yes, implementation of and adherence to the Commission's Audit Procedure, Doc. No. 00131, ensures compliance to ISO 14001 4.5.5.

2015 Internal Integrated Audit Checklist:
R2:2013, OHSAS 18001:2007, ISO 14001:2004, IA EMS: HF 2570; In accordance with ISO 19011:2011

Kurt	21 (EMS)	How has the organization determined competency of its internal auditors?	Conforms	As prescribed in the Audit Procedure, Doc. No. 00131: Iowa EMS Training - from outside EMS auditing training course or observed at least one internal audit. R2-2013/ISO 14001/OSHAS 18001 – Training from outside EMS audit training course on ISO 14001, OSHAS 18001 and/or R2-2013.
Kurt	22 (EMS)	Has the organization conducted a management review after its full-system, process-based internal audit?	Conforms	Yes, dated 3/31/2014, Management Review, Doc. No. 01389. (available upon request).
Kathy	34	Does the recycler have evidence of corrective actions that address issues of non-compliance? [section (a)(3)]	Conforms	Yes, as explained in the Audits Procedure, Doc. No. 00131, and in completed audits and compliance reviews uploaded to Intalex in the Audits module: Internal Audit #00036, Follow -up Int. Audit #00052, 3rd Party Compliance Review #00047, External Audit #00053. Following the Non-Conformance and Corrective Action Procedure, Doc. No. 01009, non-audit findings and fixes can be found in the Non-Conformance and Corrective Action module in Intalex.
Bryce	35	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? [section (a)]	Conforms	Yes, as described in the following documents: Legal & Other, Doc. No. 00119, EDF Ops Plan, Doc. No. 00151, EDF Ops Training, Doc. No. 00142, Training Awareness & Competency, Doc. No. 00122. (verification of completed training upon request)
Bryce	9b (EMS)	Does training take into account different levels of skill and ability?	Conforms	Yes, in hiring and best management practices, and also as detailed in the following documents: EDF Ops Plan, Doc. No. 00151, EDF Ops Training, Doc. No. 00142, Training Awareness & Competency, Doc. No. 00122. (verification of completed training upon request)
Briggs	36	Does the recycler adhere to good housekeeping standards, including keeping all work and storage areas clean and orderly? [section (b)]	Conforms	Yes, it is evident by the appearance of the Commission's facilities, and can be proven by the implementation and completion of these checklists: EDF Housekeeping - Shop, Doc. No. 01249, EDF Housekeeping - Office, Doc. No. 01250, EDF Housekeeping - Reuse, Doc. No. 01251.
Briggs	37	Is housekeeping for all areas of the facility planned, regularly implemented, and monitored? [section (b)]	Conforms	See Q#36 above
Briggs	38	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? [section c]	Conforms	Yes, the use of the following documents ensure environmental, health & safety risks are evaluated: New Process/Equipment Change Form, Doc. No. 01281, EDF Ops Training, Doc. No. 00142, EDF Ops Plan, Doc. No. 00151, Completed Process Change Form, Doc. No. 01282, PPE Hazard Assessment, Doc. No. 01018, PPE Written Plan, Doc. No. 01017.
Keith	12a (EMS)	Is there a documented procedure for operational controls for activities that the organization has identified as hazardous or risky?	Conforms	Yes, the Operational Control procedure, Doc. No. 01382, Aspects & Impacts, Doc. No. 00116, EDF Ops Plan, Doc. No. 00151, EDF Ops Training, Doc. No. 00142, PPE Hazard Assessment, Doc. No. 01018, JSA's, Doc. No. 01294.

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Keith	9	Can the organization prove that the controls it has in place for worker safety in relation to CRT shredding are commensurate with the risks of the activity/activities? (Show documentation.)	Conforms	Risks associated with shredding CRT's are mitigated by following the risk management hierarchy: elimination, substitution, engineering controls, signage/warnings and or administrative controls, and personal protective equipment. This is described in the EDF Ops Plan, Doc. No. 00151, and reviewed by a 3rd party compliance audit, found in the Intelix Audit Module, record #00047.
Bryce	5 (EMS)	How does the organization ensure that an SDS is acquired for new products or materials used in processing? (R2: 2013: 4(d)2)	Conforms	The New Product/Operational Process Change Form, Doc. No. 01281, is utilized when new items are identified. In conjunction with that, the Commission subscribes to an online management tool called SDS Binderworks. All identified materials are found on the site which manages the most current information available for each product. Email updates are sent whenever new information is available so that the hardbound copies are updated as well.
Bryce	39	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.? [section c]	Conforms	Yes, please see the PPE Hazardous Assessment, Doc. No. 01018, JSA's, Doc. No. 01294, the EDF Ops Plan, Doc. No. 00151, and EDF Ops Training, Doc. No. 00142.
Bryce	40	Is the hazards identification and assessment captured in writing and incorporated as a component of the recycler's EHSMS? [section c]	Conforms	See Q#39 above
Bryce	41	Does the recycler have records of managing the EH&S hazards through corrective action? [section (d)]	Conforms	Yes, as evident in the following documents: Aspects & Impacts Procedure, Doc. No.00116, New Product/ Operational Process Change Form, Doc. No. 01281, Non-Conformance & Corrective Action Procedure, Doc. No. 01009, Incident Report Form, Doc. No. 01065, Incident Report Log, Doc. No. 01211, Incident Investigation, Doc. No. 01381, and the EDF Ops Plan, Doc. No. 00151.
Bryce	42	Does the recycler have evidence demonstrating it has minimized the risks identified? [section (d)]	Conforms	Risks are mitigated by following the following risk management hierarchy: elimination, substitution, engineering controls, signage/warnings and or administrative controls, and personal protective equipment. This is described in the EDF Ops Plan, Doc. No. 00151 and by use of the PPE Hazardous Assessment, Doc. No. 01018, and JSA's, Doc. No. 01294.
Bryce	43	Does the recycler implement and prioritize the use of appropriate strategies, including engineering controls, administrative controls, and personal protective equipment? [section (d){1-3}]	Conforms	See Q#42 above
Bryce	17 (EMS)	What is the organization's procedure for recording, investigating, and analyzing incidents – root cause analysis – to meet requirements in 4.5.3.1 a-e?	Conforms	The procedure is outlined in the Internal Communication Procedure, Doc. No. 00118, and by the use of the Incident Report Form, Doc. No. 01065, Incident Report Log, Doc. No. 01211, Incident Investigation, Doc. No. 01381, and the Incident Flowchart, Doc. No. 01378.

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Keith	44	Does the recycler use monitoring and sampling protocols to continuously manage the risks it has identified? [section (e)]	Conforms	Yes, as evident in the Equip. Calibration & Maint., and Health & Safety Monitoring Procedure, Doc. No. 01008, employee testing results (available upon request), and the EDF Ops Plan, Doc. No. 00151.
Keith	45	Does the recycler comply with all applicable permissible exposure limits for sampling and/or monitoring? [section (e)]	Conforms	Yes, test results can be found in binders on the EDF Conf Rm shelves. We did have an Objective & Target regarding expanding testing, completion date of 12/18/14. (available upon request)
Keith	46	Does the recycler treat anyone performing activities under its direction, using the same standard of care? [section (f)]	Conforms	Yes, the EDF Ops Plan, Doc. No. 00151, notes that all employs are subject to the same health and safety standards equally, regardless of position.
Bryce	47	Has the recycler designated a qualified employee(s) or consultant(s) to coordinate its efforts to promote worker health and safety and environmental protection? [section (g)]	Conforms	Yes, and can be found in the Safety Committee Charter, Doc. No. 01384 and the Training, Awareness, & Competency Procedure, Doc. No. 00122 as the Special Waste Coordinator.
Bryce	48	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? [section (g)]	Conforms	Yes, through Toolbox Talks & Trainings & Drills (available from Bryce upon request), and Safety Committee Mtg Mins, Doc. No. 01386
Bryce	49	Has the recycler identified probable emergency situations and exceptional circumstances? [section (h)]	Conforms	Yes, and can be found in the ERRAP, Doc. No. 00146, Aspects & Impacts, Doc. No. 00116, and the Emergency Response Guide, Doc. No. 01351.
Bryce	50	Has the recycler documented and updated as necessary an emergency plan(s) for the probable emergencies? [section (h)]	Conforms	Yes, ERRAP Doc. No. 00146, Emergency Response Guide, Doc. No. 01351
Bryce	51	Does the emergency plan(s) consider workers, the public, and the environment? [section (h)]	Conforms	Yes, ERRAP, Doc. No. 00146, and Ops Plan Doc. No. 00151, Emergency Response Guide, Doc. No. 01351
Bryce	52	Does the recycler periodically test the emergency plans(s)? [section (h)]	Conforms	Trainings & Drills (available from Bryce upon request, ex. Rec. #62)
Bryce	53	Are occurrences of emergency events, reported to the required authorities? [section (h)]	Conforms	There have been no reportable incidents from within R2 scope, but it is the Commission's ERRAP, Doc. No. 00146, Section #5, to do so as needed.
Keith	54	<u>Development and Adherence to an FM Management Plan</u> – Has the recycler analyzed, planned, and documented in an “FM Management Plan” how the FMs that pass through its facility or control are properly managed in accordance with Provision 5? [section (a)]	Conforms	Yes, FM Mgmt Plan, Doc. No. 00148, Intellex Review history of 00148.

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Keith	55	Does the FM Management Plan address on-site requirements for managing FMs? [section (a)]	Conforms	Yes, the FM Mgmt Plan, Doc. No. 00148, addresses on-site audit requirements. The On-Site Audit Decision Tree, Doc. No. 01363, is a tool used in this process.
Keith	56	Does the FM Management Plan address downstream vendor requirements for managing FMs? [section (a)]	Conforms	Yes, FM Mgmt Plan, Doc. No. 00148
Keith	57	Has the recycler regularly reviewed, and updated as necessary the FM Management Plan? [section (a)]	Conforms	Yes, FM Mgmt Plan, Doc. No. 00148, Intellex review and revision history of 00148.
Keith	58	Is the document or section in the EHSMS titled "FM Management Plan"? [section (a)]	Conforms	Yes, FM Management Plan, Doc. No. 00148
Briggs	59	<u>Removal of FMs</u> – Are FM's and toner cartridges safely removed prior to shredding or materials recovery of equipment or components? (Note exceptions in section (5) (b)).	Conforms	Yes, removal of FMs and toner cartridges is required by the FM Management Plan, Doc. No. 148, and the EDF Ops Plan, Doc. No. 151, and staff are trained on this process as part of the EDF Ops Training, Doc. No. 142. (edit)
Keith	60	Are items containing mercury sent for mercury retorting, or other legal methods, excluding incineration? [section (c)]	Conforms	Yes. No mercury items are sent for incineration, and mercury items are sent for retorting through an approved vendor as per the FM Procedure (Doc. No. 148) and EDF Operations Plan (Doc. No. 151). Shipping documents confirm this.
Briggs	61	Are batteries and mercury relays removed from circuit boards prior to processing? [section (c)]	Conforms	Yes. See information provided for question 59.
Keith	62	Are circuit boards processed for metals recovery? [section (c)]	Conforms	Yes. EDF Ops Plan, Doc. No. 00151, FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012, shipping records
Keith	63	Are items containing polychlorinated biphenyls (PCBs) destroyed with technology for safe and effective destruction in facilities meeting applicable legal requirements for PCB destruction? [section (c)]	Conforms	Yes. EDF Ops Plan, Doc. No. 00151, FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012, shipping records
Keith	64	<u>Prohibition on Energy Recovery, Incineration, and Land Disposal of FMs</u> – Verify no Focus Materials are sent for disposal by land, incineration, or energy recovery. [section (d)]	Conforms	Yes. EDF Ops Plan, Doc. No. 00151, FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012, shipping records
Keith	65	Does the recycler have a documented process for evaluating downstream vendors for conformance to the R2:2013 downstream due diligence requirements? [section (e)]	Conforms	Yes, FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012

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Keith	66	Is downstream due diligence completed for 100% of approved recyclers? [section (e)]	See Q#3 above	See Q#3 above
Keith	67	Is downstream due diligence completed for 100% of approved refurbishers under R2/Ready for Repair? [section 6(c)(3)]	Conforms	Yes, see the Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012, and shipping records for Dynamic Recycling (currently the only Reuse vendor being utilized).
Keith	68	Have all approved downstream vendors been verified to conform to the recycler's FM Management Plan? [Section (e)(1)]	See Q#3 above	See Q#3 above
Keith	69	Have all approved downstream vendors been verified to have a documented EH&S management system? [Section (e)(2)]	Conforms	Yes, FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012
Keith	70	For downstream vendors without a certified EH&S Management System, is there evidence that the EHSMS was evaluated for the components of R2:2013 Provision 3 and 4 as criteria for the documented EHSMS? [Section (e)(2)]	Conforms	Yes, FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012
Keith	71	Have all approved downstream vendors had a thorough review of legal compliance history to applicable EH&S regulations? [section (e)(3)]	Conforms	Yes, FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012
Keith	72	Do all approved downstream vendors maintain a list of current environmental permits and copies of each? [section (e)(3)]	Conforms	Yes, FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012
Keith	73	Do all approved downstream vendors conduct due diligence at least annually on further downstream vendors of FM's to these same requirements? [section (e)(4)]	Conforms	Yes, FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012
Keith	74	Do all approved downstream refurbishers conform to the reuse requirements in Provision 6? [section (e)(5)]	Conforms	Yes, see the Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012, and shipping records for Dynamic Recycling.
Keith	75	Have all approved downstream vendors provided a list of names and locations for all downstream vendors handling recycler's focus materials throughout the recycling chain? [section (e)(6)]	Conforms	Yes, FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012

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Keith	76	Do all approved downstream vendors maintain commercial documentation to track the transfer of equipment, components, and materials from recycler? [section (e)(6)]	Conforms	Yes, FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012
Keith	77	Does each approved downstream vendor maintain a security program for recycler's material commensurate with the degree of sensitivity of the equipment provided? [section (e)(7)]	See Q#3 above	<i>Note: It would be recommended that the vendor verification and audit forms specifically request and document vendor's security programs. The adoption of the Seri audit checklists will be helpful in this regard.</i>
Keith	78	Are there controls in place to secure the shipment of electronic equipment between the recycler and each downstream vendor? [section (e)(7)]	Conforms	Yes, EDF Ops Plan, Doc. No. 00151, FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012
Keith	79	Does the recycler confirm at least annually and document that each approved downstream vendor continues to conform to the requirements of Section (e) for as long as it receives FMs directly or indirectly from the recycler? [section (f)]	See Q#3 above	<i>Note: It would be recommended that the vendor verification process be streamlined to catch approval expiration dates in a more automated, fail-safe way. The adoption of the Seri audit checklists will be helpful, as well as further utilization of Intalex and it's reminder capabilities.</i>
Keith	80	If the recycler uses an R2:2013 certified downstream facility, does the recycler verify conformance to the recycler's FM Management Plan in 5(e)(1)? [section (g)]	See Q#3 above	Yes, the facility confirms conformance with its FM management plan through FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012, and shipping documents.
Keith	81	If the recycler uses an R2:2013 certified downstream facility, does the recycler document the throughput of FM's by the downstream facility through the recycling chain as required in 5(e)(6)? [section (g)]	Conforms	Yes, FM Mgmt Plan, Doc. No. 00148, Completed Vendor Verification Forms, Doc. No. 01336 (w/audit packets), Vendor Status Form, Doc. No. 01012, and shipping documents (available upon request)
Keith	82	Does the recycler manage print cartridges in accordance with the reuse hierarchy of Provision 2? [section (h)]	Conforms	Yes. Print cartridges are shipped to Waste Management for reuse in accordance with the FM Mgmt Plan, Doc. No. 148, EDF Ops Plan, Doc. No. 151, and EDF Ops Training, Doc. No. 142. (edit)
Keith	83	Are ink and toner print cartridges sent to either remanufacturers, recyclers, or Original Equipment Manufacturers (OEM)? [section (h)]	Conforms	Yes. See information provided for question 82.
Omar	84	Does the recycler prevent customer equipment or components from being resold or donated for reuse if contrary to the customer's agreement? [section (a)]	Conforms	Yes. This is documented in the Quality Assurance Plan, Doc. No. 1413.

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Omar	85	Does the recycler label and sort each shipment downstream to track throughput? [section (b)(1)]	Conforms	Yes. This is documented in the Quality Assurance Plan, Doc. No. 1413. Shipments are labeled with the full phrase for reuse levels 1, 2 and 3 prior to sending.
Omar	86	Does the recycler sanitize all data on reusable equipment before it is shipped downstream? [section (b)(2)]	Conforms	Yes. Data is sanitized following the process outlined in the Electronic Demanufacturing Facility Operations Plan, Doc No. 151, as well as the Quality Assurance Plan, Doc. No. 1413. Data is wiped using software, then audited through a separate process. Finally, a regularly scheduled spot-audit is conducted by a third party. Documentation of these audits should be recorded within Intellex.
Omar	87	Does the recycler handle and package shipments for reuse to prevent damage of the equipment during transit? [section (b)(3)]	Conforms	Yes. According to the Quality Assurance Plan, Doc. No. 1413, all materials for reuse are packaged according to the R2 standard. Further, a facility walk-through confirmed that this is taking place in the Reuse Program area.
Omar	88	Does the recycler package shipments for reuse in light of the risks posed during shipment? For example, refurbished batteries packaged according to transport regulations to prevent fires or spills. [section (b)(3)]	Conforms	Yes. The Quality Assurance Plan, Doc. No. 1413 assures against risk during shipment through appropriate packaging.
Omar	89	Are shipments for reuse identified prior to shipment as: (1) Tested for Full Functions, R2/Ready for Reuse; (2) Tested for Key Functions, R2/Ready for Resale; and/or (3) Evaluated and Non-Functioning, R2/Ready for Repair? [section (c)]	Conforms	Yes. The Quality Assurance Plan, Doc. No. 1413, requires that shipments be labeled with the full language required by R2 that identifies the reusable items as level 1, 2 or 3.
Omar	90	Tested and Full Functions, R2/Ready for Reuse – Are all equipment functions tested, working properly and ready for reuse as if it were new? [section (c)(1)(A)]	Conforms	Yes. According to the Quality Assurance Plan, Doc. No. 1413, all materials slated for reuse level 1 are tested for full functions, and any minor cosmetic defects are disclosed before resale.
Omar	91	Is R2/Ready for Reuse equipment loaded with legally licensed software, drivers, and configured? [section (c)(1)(A)]	Conforms	Yes. The facility is a certified Microsoft Certified Refurbisher. The certificate from Microsoft, or other evidence of certification, should be logged in Intellex.
Omar	92	Is the recycler currently certified to RIOS or ISO 9001 for refurbishment activities? [section (c)(1)(B)]	Conforms	No. The facility has a Quality Assurance Plan, Doc. No. 1413, that outlines refurbishment activities as specified in 6(c)(1)(b)
Omar	93	If not certified to RIOS or ISO 9001, has the recycler documented a Quality Assurance Policy? [section (c)(1)(B)]	Conforms	Yes. Quality Assurance Plan, Doc. No. 1413, includes both a policy (what we will do), referenced in the scope section of the document, and a plan (how we will do it), addressed throughout the rest of the document, to address quality assurance. In addition, the EMS Policy (Doc. No. 00141) is the umbrella policy that covers all activities, including reuse and quality assurance.

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Omar	94	If not certified to RIOS or ISO 9001, has the recycler documented a Quality Assurance Plan? [section (c)(1)(B)]	Conforms	Yes. Quality Assurance Plan, Doc. No. 1413, includes both a policy (what we will do) and a plan (how we will do it) to address quality assurance.
Omar	95	Does the Quality Assurance Plan include steps to verify the accuracy of test methods (monitoring) and test equipment (calibration) [section (c)(1)(B)]	Conforms	Yes. Quality Assurance Plan, Doc. No. 1413 (section 4.5) covers verification of accuracy of test methods. In addition, housekeeping checklists are employed. The Data Security Procedure, Doc. No. 1007, also addresses equipment used for testing. Record of tests should be added to Intelex, even if they remain controlled externally. Reference to this process should be added to the appropriate procedure(s).
Omar	96	Does the Quality Assurance Plan include procedures to maintain records of verification and results of testing? [section (c)(1)(B)]	Partially	The Quality Assurance Plan, Doc. No. 1413, includes reference to housekeeping checklists (section 4.5). The procedure will be updated to include reference to the current process in place for maintaining testing records.
Omar	97	Does the recycler have a written Product Return Policy which includes specific policies for R2/Ready for Reuse equipment? [section (c)(1)(C)]	Conforms	Yes. The Product Return Plan, Doc. No. 1428, includes the policy for accepting and making refunds for returned items.
Omar	98	Does the recycler have a written Product Return Plan that includes plans for R2/Ready for Reuse equipment sold? [section (c)(1)(C)]	Conforms	Yes. The Product Return Plan, Doc. No. 1428, includes the policy for accepting and making refunds for returned items.
Omar	99	Is the Product Return Policy and Plan appropriate for the final destination of R2 Ready for Reuse equipment? [section (c)(1)(C)]	Conforms	Yes. The Product Return Plan, Doc. No. 1428, includes the policy for accepting and making refunds for returned items.
Omar	100	Is the Product Return Policy and Plan appropriate for the type of equipment sold to an end user as R2 Ready for Reuse? [section (c)(1)(C)]	Conforms	Yes. The Product Return Plan, Doc. No. 1428, includes the policy for accepting and making refunds for returned items.
Omar	101	Has the Product Return Policy and Plan been communicated to buyers and sales persons as one step in the implementation? [section (c)(1)(C)]	Conforms	Yes. The Product Return Plan, Doc. No. 1428, is posted with each item for sale within the facility's online eBay store (the only place where it sells electronics online). The QAP should document a requirement that it be shared with all buyers before sale, not only those purchasing off eBay.
Omar	102	Is the recycler's R2/Ready for Reuse equipment and components clean and free of major cosmetic defects? [section (c)(1)(D)]	Conforms	Yes. The Quality Assurance Plan, Doc. No. 1413, states that materials will be clean and that any minor cosmetic defects will be disclosed.
Omar	103	Does the recycler ensure that R2/Ready for Reuse equipment or components meet the requirements of the recipient? [section (c)(1)(E)]	Conforms	Yes. The Quality Assurance Plan, Doc. No. 1413, states that items will be tested to have full function and that any minor cosmetic defects will be disclosed prior to sale.

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Omar	104	Tested for Key Functions, R2/Ready for Resale – Does the recycler use effective test methods and testing equipment to confirm that the Key Functions of the equipment or components are working properly? For example, are “key functions” defined for each type of equipment and processes written to specify expected results for “working”? [section (c)(2)(A)]	Conforms	The facility defines key functions as fully functional and sells fully functional items under level 1. Items failing testing for full functionality are shipped under level 3. The facility does not have the ability to repair or refurbish items that are not fully functional, so this testing is essentially outsourced to the wholesale vendor purchasing electronics as level 3, as outlined in the Quality Assurance Plan, Doc. No. 1413. Only components are shipped under level 2 when fully functional but bearing cosmetic defects.
Omar	105	Is the recycler currently certified to RIOS or ISO 9001 for refurbishment activities? [section (c)(2)(B)]	Conforms	No.
Omar	106	If not certified to RIOS or ISO 9001, has the recycler documented a Quality Assurance Policy? [section (c)(2)(B)]	Conforms	Yes. Quality Assurance Plan, Doc. No. 1413.
Omar	107	If not certified to RIOS or ISO 9001, has the recycler documented a Quality Assurance Plan? [section (c)(2)(B)]	Conforms	Yes. Quality Assurance Plan, Doc. No. 1413, includes both a policy (what we will do) and a plan (how we will do it) to address quality assurance.
Omar	108	Does the Quality Assurance Plan include steps to verify the accuracy of test methods (monitoring) and test equipment (calibration) [section (c)(2)(B)]	Conforms	No. The facility does not have the ability to repair or refurbish items that are not fully functional, so this testing is essentially outsourced to the wholesale vendor purchasing electronics for resale, as outlined in the Quality Assurance Plan, Doc. No. 1413. Items sold under level 2 are fully functional, but they may bear cosmetic defects.
Omar	109	Does the Quality Assurance Plan include procedures to maintain records of verification and results of testing? [section (c)(2)(B)]	Conforms	No. The facility does not have the ability to repair or refurbish items that are not fully functional, so this testing is essentially outsourced to the wholesale vendor purchasing electronics for resale, as outlined in the Quality Assurance Plan, Doc. No. 1413. Items sold under level 2 are fully functional, but they may bear cosmetic defects.
Omar	110	Does the recycler have a written Product Return Policy which includes specific policies for R2/Ready for Resale equipment? [section (c)(2)(D)]	Conforms	Yes. The Product Return Plan, Doc. No. 1428, includes the policy for accepting and making refunds for returned items.
Omar	111	Does the recycler have a written Product Return Plan that includes plans for R2/Ready for Resale equipment sold? [section (c)(2)(D)]	Conforms	Yes. The Product Return Plan, Doc. No. 1428, includes the policy for accepting and making refunds for returned items.
Omar	112	Is the Product Return Policy and Plan appropriate for the final destination of R2 Ready for Resale equipment? [section (c)(2)(D)]	Conforms	Yes. The Product Return Plan, Doc. No. 1428, includes the policy for accepting and making refunds for returned items, regardless of the recipient.

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Omar	113	Is the Product Return Policy and Plan appropriate for the type of equipment sold? [section (c)(2)(D)]	Conforms	Yes. The Product Return Plan, Doc. No. 1428, includes the policy for accepting and making refunds for returned items.
Omar	114	Has the Product Return Policy and Plan been communicated to buyers and sales persons as one step in the implementation? [section (c)(2)(D)]	Partially	Yes, partially. The Product Return Plan, Doc. No. 1428, is shared with online buyers. The document should be updated to state that all buyers of material, regardless of level, will be informed of the Plan.
Omar	115	Does the recycler disclose to buyers any functions that are not working properly with R2/Ready for Resale shipments? [section (c)(2)(C)]	Conforms	Yes. The Quality Assurance Plan, Doc. No. 1413, requires that any defects be disclosed to buyers.
Omar	116	Does the recycler provide a description of cosmetic defects and missing components with R2/Ready for Resale shipments? [section (c)(2)(C)]	Conforms	Yes. The Quality Assurance Plan, Doc. No. 1413, requires that any defects be disclosed to buyers.
Omar	117	Does the recycler ensure that the equipment or components meet the specifications of the recipient vendor or the end user? [section (c)(2)(E)]	Conforms	Yes. The Quality Assurance Plan, Doc. No. 1413, states that items will be tested for full functionality and that any defects will be disclosed prior to sale.
Omar	118	Evaluated and Non-Functioning, R2/Ready for Repair – Does the recycler have a process to evaluate equipment for repair and qualify downstream refurbishers for testing/repairing of non-functioning equipment? [section (c)(3)]	Conforms	Yes. The Quality Assurance Plan, Doc. No. 1413, states that level 3 materials will be shipped only to R2:2013 certified vendors.
Omar	119	Has the recycler documented a Quality Assurance Policy? [section (c)(3)(A)]	Conforms	Yes. Quality Assurance Plan, Doc. No. 1413, includes both a policy (what we will do) and a plan (how we will do it) to address quality assurance.
Omar	120	Has the recycler documented a Quality Assurance Plan? [section (c)(3)(A)]	Conforms	Yes. Quality Assurance Plan, Doc. No. 1413, includes both a policy (what we will do) and a plan (how we will do it) to address quality assurance.
Omar	121	Does the Quality Assurance Plan include steps to determine if the equipment is capable of repair and refurbishment? [section (c)(3)(A)]	Conforms	No. The facility does not have the ability to test items beyond full function. Therefore, items shipped under level 3 are shipped only to R2:2013 vendors, as outlined in the Quality Assurance Plan, Doc. No. 1413.
Omar	122	Does the Quality Assurance Plan evaluation for repair include evaluating condition, functionality, and sales price of the equipment in the destination market? [section (c)(3)(A)]	Conforms	No. The facility does not have the ability to test items beyond full function. Therefore, items shipped under level 3 are shipped only to R2:2013 vendors, as outlined in the Quality Assurance Plan, Doc. No. 1413.
Keith	123	For shipments of R2/Ready for Repair equipment to an R2:2013 certified refurbisher, is the downstream refurbisher qualified according to Provision 5(g)? [section (c)(3)(B)(i)]	Conforms	Yes. The vendor packet for Dynamic Recycling, the vendor to which the facility ships items under level 3, conforms to Provision 5 (g), including adherence to the facility's FM management plan and tracking throughput.

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Omar	124	For shipments of R2/Ready for Repair equipment to any other vendor, is the downstream refurbisher verified to meet the R2:2013 requirements under 6(c)(1) and 6(c)(2)? [section (c)(3)(B)(ii)]	Conforms	No other vendors are used.
Omar	125	For shipments of R2/Ready for Repair equipment to any other vendor, does the downstream refurbisher only resell R2/Ready for Reuse and R2/Ready for Resale equipment? The downstream refurbisher cannot sell equipment to another refurbisher in an untested or non-functioning condition. [section (c)(3)(B)(ii)]	Conforms	No other vendors are used.
Omar	126	Do the buyers/downstream vendors of equipment in Evaluated and Non-Functioning, R2/Ready for Repair condition meet the downstream requirements of Provision 5? [section (c)(3)(B)(iii)]	Conforms	Yes. The vendor packet for Dynamic Recycling, the vendor to which the facility ships items under level 3, conforms to Provision 5 (g), including adherence to the facility's FM management plan and tracking throughput.
Omar	127	Do the shipments of equipment in Evaluated and Non-Functioning, R2/Ready for Repair condition meet the exporting requirements of Provision 3? [section (c)(3)(B)(iii)]	Conforms	Only R2:2013 vendors are used.
Omar	128	Does the recycler ensure that the equipment or components meet the specifications of the recipient vendor? [section (c)(3)(C)]	Conforms	Yes. The Quality Assurance Plan, Doc. No. 1413, states that items will be tested for full functionality and that any defects will be disclosed prior to sale.
Omar	129	If the recycler sells "Collectible Electronics" are these items qualified as "rare, vintage, and no longer manufactured or supported by the original manufacturer?" [Definitions]	Conforms	The facility does not sell collectible or specialty electronics because it does not possess the technical capability to test or repair these items.
Omar	130	If the recycler sells "Specialty Electronics" are these items qualified as "rare and specialized equipment not generally available in retail?" [Definitions]	Conforms	The facility does not sell collectible or specialty electronics because it does not possess the technical capability to test or repair these items.
Omar	131	Does the recycler not possess the technical capability to test or repair collectible or specialty electronics? [section (d)]	Conforms	The facility does not sell collectible or specialty electronics because it does not possess the technical capability to test or repair these items.

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Omar	132	Is the recycler tracking sales of collectible or specialty electronics to verify the sales are less than 1% of total individual units by quantity sold on a rolling 12 month average? [section (d)]	Conforms	The facility does not sell collectible or specialty electronics because it does not possess the technical capability to test or repair these items.
Omar	133	Do sales of collectible or specialty electronics include returns at no cost to the buyer? [section (d)]	Conforms	The facility does not sell collectible or specialty electronics because it does not possess the technical capability to test or repair these items.
Omar	134	Do sales of collectible or specialty electronics conform to the legal requirements in Provision 3? [section (d)(1)]	Conforms	The facility does not sell collectible or specialty electronics because it does not possess the technical capability to test or repair these items.
Briggs	135	Does the recycler maintain for at least three years commercial contracts, bills of lading, or other commercially-accepted documentation for all transfers of equipment, components, and material? Note: The recycler does not need to track non-FMs beyond the first tier downstream vendor. [section (a)]	Conforms	According to the Electronic Demanufacturing Facility Operations Plan, Doc. No. 151 (section 5.2), all documents are kept for a minimum of three years. Review of shipping records for Alter, Clean Harbors and Arcoa showed all records for at least three years.
Kathy & Omar	14 (EMS)	Can the organization provide documentation (e.g. mass balance sheet) that proves that all materials received/shipped match, including items that are diverted for resale or reuse? Can the organization, through maintenance of at least three years of records, provide upon customer request the names and locations of all downstream vendors in the recycling chain that handle the customer's FMs?	Conforms	According to information included in the Iowa DNR facility report for 2014, the CRT versus non-CRT spreadsheet, information housed within the pallet tracker system, and information housed by the reuse program, a mass balance may be reached.
Keith	136	Does the recycler provide, to each customer that is R2:2013 certified or in the process of R2:2013 certification, upon request the names and locations of all downstream vendors in the recycling chain that handle said customer's FMs? [section (b)]	Conforms	Yes. This information is collected through the Vendor Status Form, Doc. No 1012.
Briggs	137	Has the recycler incorporated the applicable requirements of NIST 800-88 or other generally-accepted standard into its data destruction procedures? [section (a)]	Conforms	Yes. The Electronic Demanufacturing Facility Operations Plan, Doc. No. 151, specifies that the facility will adhere to NIST 800-11. This also is reflected in the Electronic Demanufacturing Facility Operations Training, Doc. No. 142 and the Data Security Procedure, Doc. No. 1007. The NIST guidelines are logged in Intalex, Doc. No. 72.

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Briggs	138	Does the recycler adhere to the incorporated data destruction standards for all data bearing media? [section (a)]	Conforms	Yes. In addition to the information given for question 137 above, a facility walk-through provided specific evidence of data destruction standards being followed. All data-containing items were in locked containers and/or cages.
Briggs	139	Does the recycler document its data destruction procedures and include this documentation as part of its EHSMS? [section (b)]	Conforms	Yes. In addition to the information given for questions 137 & 138 above, the facility documents data-wiping and shredding activities, as well as shipments of data-containing items. Records of data-wiping should be referenced in procedures and logged as externally controlled documents within Intellex.
Omar	140	Are instructions for the identification of media containing data and requiring sanitization included in the recycler's EHSMS? [NIST 800-88 Section 4.2]	Conforms	Yes. The Electronic Demanufacturing Facility Operations Plan, Doc. No. 151, requires specific handling and security for data-containing items. In addition, the Data Security Procedure, Doc. No. 1007, provides additional instruction for data sanitization and auditing.
Omar	141	Do employees involved in data destruction receive appropriate training in data destruction processing? [section (c)]	Conforms	See information given for question 142.
Omar	142	Do employees involved in data destruction receive repeat training in data destruction processing on a regular basis? [section (c)]	Conforms	The Training, Awareness & Competency Procedure, Doc. No. 122, defines competency for all positions, inclusive of the reuse program and data destruction activities, and required regular training. In addition, the Electronic Demanufacturing Facility Operations Plan, Doc. No. 142, states that the Reuse Coordinator will provide training to employees engaged in reuse activities, which include data destruction.
Omar	143	Are employees involved in data destruction pre-qualified through an evaluation of competency prior to processing media for data destruction? [section (c)]	Conforms	The Training, Awareness & Competency Procedure, Doc. No. 122, defines competency for all positions, inclusive of the reuse program and data destruction activities, and required regular training. In addition, the Electronic Demanufacturing Facility Operations Plan, Doc. No. 142, states that the Reuse Coordinator will provide training to employees engaged in reuse activities, which include data destruction.
Omar	144	Are data destruction validation requirements and processes documented in the data destruction procedures as part of the EHSMS? [section (d)]	Conforms	Yes. The Data Security Procedure, Doc. No. 1007, outlines processes and requirements.
Bryce	145	Are data destruction processes reviewed and validated by an independent party on a periodic basis as defined in the data destruction procedures? [section (d)]	Conforms	Yes, a third-party compliance audit is performed on a regular basis. A complete compliance audit was conducted May 2, 2014, and an audit of hard drives whose data had been sanitized was conducted by Scott County Information Technology. Need to Document Scott IT audits in Intellex and reference the process for this in applicable procedure(s).
Keith	146	Are quality controls for data destruction documented? [section (e)]	Conforms	Yes. In addition to the information given for question 145, the Quality Assurance Plan, Doc. No. 1314 documents quality controls and processes for data destruction.
Briggs	147	Are quality controls for data destruction effectively implemented and used? [section (e)]	Conforms	Yes. The Equipment Calibration and Maintenance, and Health & Safety Monitoring Procedure, Doc. No. 1008, outlines requirements for monitoring. Records of implementation include the Shred 50-hour Inspection, Doc. No. 1261. In addition, the Data Security Procedure, Doc. No. 1007, specifies monitoring and calibration activities for data destruction.

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Omar	148	Are quality controls for data destruction regularly monitored internally for effectiveness? [section (e)]	Conforms	Yes. See information given for question 145-146.
Keith	149	Has the level of sensitivity of data on media received at the facility been determined? [section (f)]	Conforms	Yes. Both the Electronic Demanufacturing Facility Operations Plan, Doc. No.151, and the Data Security Procedure, Doc. No. 1007, outline specific handling instructions for handling all potentially data-containing materials with the same level of security. All materials are treated as highly sensitive.
Keith	150	Are security controls for media containing data documented? [section (f)]	Conforms	See information provided for question 149.
Keith	151	Are documented security controls for media containing data implemented? [section (f)]	Conforms	Yes. A walk-through of the facility confirmed that security protocol is being followed. Hard-drives for reuse are locked in the reuse cage; drives for shredding are locked in boxes, as are other small items such as cell phones, MP3 players, and PDAs.
Keith	152	Are security controls and procedures maintained and updated as changes occur in facility, personnel, or media sensitivity? [section (f)]	Conforms	Yes. The New Product/Operational Process Change Form, Doc. No. 1281, requires new materials to be evaluated and new processes or facility changes to be considered and evaluated. The Training, Awareness and Competency Procedure, Doc. No. 122, requires training of new staff.
Keith	153	Are implemented security controls appropriate for the most sensitive classification of media accepted at the facility? [section (f)]	Conforms	Yes. See information given for question 149.
Keith	154	Do security controls consider physical security, monitoring, chain-of-custody, and personnel qualifications? [section (f)]	Conforms	Yes. The Data Security Procedure, Doc. No. 1007, outlines processes and requirements. The Training, Awareness & Competency Procedure, Doc. No. 122, determines personnel qualifications.
Briggs	155	Are adequate records of data destruction maintained by the recycler and each downstream vendor conducting data destruction? [section (g)]	Conforms	Yes. The facility uses the Data Destruction Vendor Verification, Doc. No. 10131, and the Data Destruction Vendor Audit Checklist, Doc. No. 1332, to record that the facility and its downstream vendors meet requirements. In addition, Document Destruction provides certificates of destruction; the facility maintains HDD wipe logs and HDD audit logs. Finally, the facility issues certificates of destruction upon request. Wipe logs should be added to Intellex.
Keith	156	If data destruction is handled by a downstream vendor, does the R2:2013 electronics recycler maintain responsibility for data destruction? [section (h)(1)]	Conforms	Yes. The facility tracks receipt of CODs in pallet tracker system and maintains with records of shipments (3 years' worth).
Keith	157	If data destruction is handled by a downstream vendor, does the R2:2013 electronics recycler ensure appropriate security, controls, and processing techniques continue to conform to Provision 8 through audits or other similarly effective means? [section (h)(1)]	Conforms	See information provided for question 3.

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Keith	158	If data destruction is handled by a downstream vendor, are media or devices containing media with data tracked and secured during transportation, storage, and processing? [section (h)(2)]	Conforms	Yes. The Ops Plan, Doc. No. 151, and the Data Security Procedure, Doc. No. 1007, outline requirements for tracking and securing data-containing items.
Keith	159	If data destruction is handled by a downstream vendor, are media or devices containing media with data tracked and secured during transportation, storage, and processing? [section (h)(2)]	Conforms	This is the exact same question as above. See information for question 158.
Omar	160	Does the recycler store items in a manner that protects them from reasonably foreseeable adverse atmospheric conditions such as rain, snow, wind, and floods? [section (a)(1)]	Conforms	Yes, materials are stored in a protected manner, as required by the Electronic Demanufacturing Facility Operations Plan, Doc. No. 151.
Keith	161	Does the recycler have a catchment system if warranted? [section (a)(1)]	Conforms	No catchment system is needed.
Bryce	162	Does the recycler store items in full legal compliance? [section (a)(2)]	Conforms	Yes, items are stored in compliance with laws housed in the Legal & Other module within Intellex. One such example is Legal & Other record no. 119, the Identity Theft Penalty Enhancement Act.
Briggs	163	Does the recycler secure items from unauthorized access? [section (a)(3)]	Conforms	Yes, the Electronic Demanufacturing Facility Operations Plan, Doc. No. 151, and the Data Security Procedure, Doc. No. 1007, outline security controls for the facility and specific materials.
Briggs	164	Does the recycler store items in clearly labeled containers and/or storage areas? [section (a)(4)]	Conforms	Yes. A walk-through of the facility confirmed that signage and labels are being used to identify materials. The focus materials area is clearly marked with signage on walls, and containers such as gaylords and bales are labeled with material and weight.
Keith	165	Does the recycler maintain a security program that controls access to all or parts of the facility? [section (a)]	Conforms	Yes. The Electronic Demanufacturing Facility Operations Plan, Doc. No. 151, and the Data Security Procedure, Doc. No. 1007, outline security controls for the facility, which include restricted access to the facility and further restrictions to the shredding area and the data-wiping area.
Keith	166	Is the security program appropriate for the type of equipment handled? [section (a)]	Conforms	Yes. See information given for questions 160-165.
Keith	167	Is the security program appropriate for the sensitivity of media containing data handled? [section (a)]	Conforms	Yes. See information given for questions 160-166.
Keith	168	Is the security program appropriate for the customers' requirements? [section (a)]	Conforms	Yes. See information given for questions 160-167. Also, if a customer requires security measures above and beyond the legal and facility-specific measures, the contract with the customer shall prevail, according to the Data Security Procedure.

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Keith	169	Does the recycler consider and include necessary controls to secure electronic equipment upon acceptance of said equipment? For example, this may include remote collection points or assuming liability at the customer's location during pickup. [section (b)]	Conforms	Yes. The Electronic Demanufacturing Facility Operations Plan, Doc. No. 151, outlines collection and transportation of materials.
Keith	18 (EMS)	What happens if there is a breach in security (data or otherwise)?	Conforms	A breach in security (data or otherwise) is an incident. Incidents trigger the use of the Incident Communication Flowchart (Doc. No. 1378) and the Incident Report Form (Doc. No. 1065), which asks if the incident is a data breach and, if so, refers to the Data Security Procedure (Doc. No. 1007). Data breach requires specific response, including customer notification. Incidents are investigated using the Incident Investigation Form (Doc. No. 1381). Further, some incidents are documented further following the Non-conformance and Corrective Action Procedure (Doc. No. 1009).
Bryce/ Kurt	170	Has the recycler demonstrated that it has evaluated the risks arising from its certification activities? [section (a)]	Conforms	Yes. Aspects and Impacts Procedure (Doc. No. 116) and scoring matrix (Doc. No. 1392) demonstrate how the facility evaluates the health & safety and environmental risks associated with its activities, products and services. Other documents supporting risk identification include the PPE Hazard Assessment (Doc. No. 1018) and the New Product/ Operational Process Change Form (Doc. No. 1281).
Kathy	171	Does the recycler have adequate insurance or reserves to cover liabilities from the evaluated risks of its certification activities, including environmental pollution and worker health and safety? [section (a)]	Conforms	Yes. The Certificate of Liability Insurance (Doc. No. 1022) provides evidence of coverage; coverage is provided based upon risk evaluation conducted by insurer. Closure Plan, Treasurers Report, Financial Assurance Document, Certified FY Audit
Kathy	172	Is a written closure plan in place and current? [section (b)]	Conforms	Yes. Iowa Code dictates closure rules for landfills and their associated facilities per 567 IAC 113 - Financial Assurance Requirements for Municipal Solid Waste Landfills (Legal & Other Record No. 94). Waste Commission of Scott County's CRT Recycling Facility permit (Doc. NO. 89) includes stipulations for closure.
Kathy	173	Does the closure plan assure proper closure of the facility? [section (b)]	Conforms	See information provided for question 172.
Kathy	174	Does the closure plan assure against abandonment of electronic equipment, components, and materials? [section (b)]	Conforms	See information provided for question 172.
Kathy	175	Is a sufficient financial instrument in place to assure against abandonment? [section (b)]	Conforms	See information provided for question 172.
Kathy	176	Is the financial instrument(s) assigned to an independent party or corporate parent with responsibility for closure, and assignment consistent with applicable law? [section (b)(1)]	Conforms	See information provided for question 172.

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Kathy	177	Does the financial instrument(s) include coverage for the evaluated risks identified? [section (b)(2)]	Conforms	See information provided for question 172.
Kathy	178	Does the financial instrument(s) include coverage for reasonably foreseeable costs of processing remaining inventory? [section (b)(2)]	Conforms	See information provided for question 172.
Kathy	179	Does the financial instrument(s) include coverage for sampling the site for environmental contamination? [section (b)(2)]	Conforms	See information provided for question 172.
Kathy	180	Does the financial instrument(s) include coverage for restoring the premise to sellable condition? [section (b)(2)]	Conforms	See information provided for question 172.
Kathy	181	Does the closure plan assign responsibility for closure to an independent party? [section (b)(3)]	Conforms	See information provided for question 172.
Kathy	182	Does the closure plan detail the closure funding information? [section (b)(3)]	Conforms	See information provided for question 172.
Kathy	183	Does the closure plan include plans for inventory processing, environmental sampling, and site remediation as needed? [section (b)(3)]	Conforms	See information provided for question 172.
Bryce	184	Does the recycler ensure that all equipment, components, and materials to be transported are packaged appropriately in light of the risk they could pose during transportation to public health or the environment? [section (a)]	Conforms	Yes. For items slated for reuse, the Quality Assurance Plan (Doc. No. 1413) calls out specific packaging requirements to shield items. In addition, the facility uses the Transportation Vendor Verification (Doc. No. 1033) to ensure that vehicles are safe and pose no unmitigated risks. The Transportation Vendor Audit (Doc. No. 1335) also is used.
Bryce	185	Does the recycler ensure that equipment is packaged according to the level of care warranted by its intended use? [section (a)]	Conforms	Yes. See reuse questions.
Bryce	186	Does the recycler ensure that equipment is secured in accordance with Provision 10? [section (a)]	Conforms	Yes. See information provided for question 184.
Keith	187	Has the recycler verified that its transporters, have all the necessary regulatory authorizations? [section (b)]	Conforms	Yes. Completed Vendor Verification Forms (Doc. No. 1336) and audit packets provide evidence.

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Keith	188	Has the recycler verified that its transporters, maintain adequate insurance coverage consistent with the material and method of transportation? [section (b)]	Conforms	Yes. See information provided for question 187.
Keith	189	Has the recycler verified that its transporters, maintained an acceptable vehicle and driver safety record during the previous 3 years? [section (b)]	Conforms	Yes. See information provided for question 187.
Keith	190	Has the recycler maintained the same standards for its own internal fleet? [section (b)]	Conforms	Yes.
Kurt	191	Does the recycler have access at the certified facility to documents and records necessary to demonstrate conformity to each requirement of this document? [section (a)]	Conforms	Yes. Documents are controlled within Intelx unless otherwise noted within the database. In the case of externally controlled documents, their physical location is logged within Intelx.
Staff	5f (EMS)	Can the organization demonstrate how hazards have been identified for all physical processes and geographic areas? Can the organization demonstrate that the operations plan reflects core elements of the EMS? (Does the way the facility conducts business reflect the 10 elements?) (R2: 2013: 4)	Conforms	Yes. See question 170 for hazard identification information. In terms of operations, the EMS manual (Doc. No. 150), outlines the elements of the system, and the Electronic Demanufacturing Facility Operations Plan (Doc. No. 151) fulfills those elements through activities that positively affect the environment by recycling materials, handling focus materials with care, and following the waste hierarchy.
NCR/OBS	Source	Description		Follow-up Action(s)
L&O	External	External audit (05/14): Legal and other listing includes LF requirements, which is not within the scope of the audit.		L&O references were relocated from the R2 location to the WCSC location, completed 07/09/14.
DSV	External	External audit (05/14): No audit reports for three main DSVs (Arcoa, Total Metals, and Dynamic).		Audit reports requested and received by 07/02/14. Vendor Status Form updated to require a copy of the audit report by 07/02/14.
C,T&A	Internal	Staff knows PROTECT, but does not identify it as our "environmental policy."		Trained staff and created "EMS @ Glance" training tool.
A&I	Internal	Scoring procedure did not allow for positive movement in scores.		New scoring system created by Core Team; procedure updated; trained on.
DC	External	EMS manual did not include all procedures.		Added procedures and document numbers.
Process	External	Material Flowchart is missing the outsourced baling and data destruction operations.		Added to flowchart.
Spill	Spill	Small mercury spill; cord cut by accident.		Trained staff to not cut unknown cords.

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CRT	CRT	Weight discrepancy in CRT load to Closed Loop.		Trained staff and implemented new pallet tracking system.
PPE	PPE	EDF staff not wearing safety glasses.		Trained on safety glasses; let staff pick glasses they like.

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Attachment K: External Audit

Summary: Iowa DNR performed the Commission's last audit of its Iowa EMS, so no attachment is necessary.