

### PURPOSE

The purpose of this resource is to provide Federal Electronics Challenge (FEC) Facility Partners best practices that will assist them in conducting an efficient and effective on-site review of an electronics recycler. Facilities are encouraged to use third party certified recyclers. However, in some locations, certified electronics recyclers may not be available. This resource is design to assist FEC Partners that would like to ensure that they meet the end-of-life management requirements in the FEC awards criteria and for annual reporting. This resource was developed by the U.S. Drug Enforcement Administration, Laredo District Office.

### OVERVIEW

The FEC encourages all federal agencies and facilities to use one of the following options when recycling electronic equipment:

- An electronics recycler certified to the Responsible Recycling (R2) Practices for Use in Accredited Certification Programs for Electronics Recyclers, or the e-Stewards Standard for Responsible Recycling and Reuse of Electronic Equipment®;
- A manufacturer's take back service for returning EPEAT-registered electronics, and/or
- An electronics recycler that your organization has conducted a physical on-site review of in the last three years.

Federal organizations may rely on a physical on-site review conducted by another federal entity, if they have a copy of the record of that review. If your organizations opts to use one of the first two options (R2-certified, e-Stewards-certified, and/or a manufacturer's take back service for EPEAT-registered products), then you know you are using a responsible recycler that uses sound recycling practices and processes. For the third option, you can confirm that an electronics recycler follows environmentally sound practices by performing an on-site review of the electronics recycler. The FEC provides a checklist that can be used to record important information during an on-site review: *Guidelines for On-Site Reviews of Electronics Recycler*, available at: <http://www2.epa.gov/fec/guidelines-site-reviews-electronics-recyclers-722012>.

### ONSITE REVIEW PROCESS STEPS AND BEST PRACTICES

#### Step 1. Select a team

Selecting a team or deciding if one person is going to do the on-site review is an important step in conducting an on-site review. A team is recommended since it helps ensure the electronics recycler's facility, procedures or work instructions, and processes can be better discussed and observed among multiple people, so that important items are not overlooked. If you have an EMS Team, then the team leader is good option for heading up the review team. The staff person that handles your property disposition is a must for the team since he or she manages all your electronics at end of life. If your organization has an Environmental, Health and Safety Manager, consider inviting them to join the review team. Lastly, any interested EMS Team member or any individual that deals with any portion of the electronics life cycle (purchase, operation and maintenance, end of life management), would also make an excellent team member. Best practice is to have a team of two to four interested people.

#### Step 2: Formulate your objectives or criteria for selecting an electronics recycler

What are your objectives in conducting an on-site review of an electronics recycler, other than ensuring they follow the environmentally sound practices outlined in the review checklist? Some objectives to consider include:

- Often a local recycler will pay for scrap metal or specific types of electronic equipment. This is money that can come back to your organization and can be used to pay for environmental items and improvements.
- Will they pick up the items to be recycled?
- Will you have to package the used electronics following specific instructions or will the recycler come and package them up?

- Is the recycler located within 250 miles, which could help you achieve an Optional Activity for the FEC award requirements?
- Do they recycle other items that you are now paying someone else to accomplish? Examples are paper, paper products, cardboard and plastics.

These can either be listed as desired objectives or simply as selection criteria along with the results of the completed on-site review checklist.

### **Step 3. Locate an electronics recycler you wish to review**

The internet provides a great tool to find electronic recyclers in your local area. You can also use the internet to determine whether a particular electronics recycler is R2 and/or e-Stewards certified, or not. Asking other organizations or agencies in your local area about who they use, and why, can be very helpful. The FEC resource, *Recycling of Federal Electronic Equipment*, available at: <http://www2.epa.gov/fec/recycling-federal-electronic-equipment-722012>, can also walk you through some steps for finding a recycler. Narrow your list of possible recyclers down to three or less.

Once you have the possible candidates for your electronics recycler, you can check websites to learn more about your candidate recyclers. It is a best practice to obtain a list of options and then find out as much as you can about the electronic recyclers on the list before you do an on-site review.

Of note, when you do an on-site review, it does not mean you accept the recycler as your future electronics recyclers. You are allowed to do as many on-site reviews you need until you find the one that best meets your criteria or objectives. Normally, if you do a good job of narrowing the list, only one on-site review will be necessary.

### **Step 4. Develop a team review plan and arrange for the on-site review**

The plan should include the objectives developed in Step 2. Also, it should include an action plan that outlines who does what during the on-site review; who looks at what during the visit, and who writes the report and sends it to FEC for their review.

Call the electronics recycler and explain that you are required to practice due diligence and would like to conduct an on-site review of their facility(ies). If they concur, explain the FEC checklist and ask them if they can complete it and email it back to you. Negotiate acceptable time suspense for their return of the checklist. This will reduce your time to conduct and finish the review and is a significant best practice.

### **Step 5. Evaluate the completed FEC checklist**

Have each team member review the completed FEC checklist and write notes on their copy of areas needing further verifications or inconsistencies.

- Do they recycle the electronics that we need recycling?
- What else do they recycle?
- Does their data add up?

Look and mark areas that are incomplete or could be incorrect so that you can get clarification when on-site.

### **Step 6. Conduct the on-site review**

Some key best practices include:

- Show up on time.
- Introduce the team and use a process of Observe, Question, Verify, & Evaluate.
- If an item was not previously filled out in the FEC checklist, fill it out at the site.
- Ask about present certifications, ISO 14001 & 9001, OHSAS 18001: 1999 and any others. Find out if they have plans and the time frame for applying for R2 and/or e-Stewards certification.

- Do they have a federal, State, or local permit for recycling operations?
- Do they recycle any hazardous waste and if so, do they have a permit, EPA number, and are the personnel trained?
- Look for organization, cleanliness, and check their procedures and training.
- Look at their downstream recipients of the recycled items or goods. Are they practicing sound recycling practices?

### Step 7. Write a report of the on-site review

Write a report that spells out the findings at the site. Were the key items on the checklist verified? If so, annotate this in the report. Other items to include in the report:

- On-Site Reviewers names and job titles
- The electronics recyclers' staff that were involved
- Findings of the preview done by team prior to the on-site review
- Professional organization of the recycler and their future intentions with regards to R2 and/or e-Stewards certification
- Discuss their input and output ratio
- Highlight the areas that the team observed and were pleased with
- Highlight any concerns or unresolved discrepancies

### Step 8. Send your recommendation to FEC for their review

After completing the report of the on-site review, obtain team approval. Send the approved report, the completed FEC on-site review checklist, and your recommendation to the FEC. FEC will not send back to you an approval or disapproval. Instead, they may list areas that need further clarification or verification. If they have questions, answer them as soon as possible. If their final comments are positive, then your organization may consider using the reviewed electronics recycler.

### Step 9. Communicate your review findings to other Federal Organizations in your area

Let other federal agencies and facilities in your local area know that the electronics recycler you conducted an on-site review of was found to be acceptable by your organization. This allows them to receive your recycled items for three years. This is true for other federal agencies in your area if they have requested from you the copy of the report and completed checklist and have received them and have on file.

## CONCLUSIONS

Conducting an on-site review can be an interesting and beneficial endeavor if the best practices outlined above are employed by your organization. It is your organization doing due diligence of an electronics recycler to ensure they use reasonable and sound practices in their recycling processes. It gives you an excellent recycler and helps your organization contribute to community relations. If the first electronics recycler is not responsible, then you select another through research, start the process over, and conduct another on-site review.

## CONTACT INFORMATION

For any questions, please contact Eddie Maggiacomo, EMS Team Chief, Laredo District Office, Laredo, Texas ([Eddie.Maggiacomo@usdoj.gov](mailto:Eddie.Maggiacomo@usdoj.gov), 956-523-6027) and/or Mario Herrera, Evidence Specialist, Laredo District office, Laredo, Texas ([Mario.Herrera@usdoj.gov](mailto:Mario.Herrera@usdoj.gov), 956-523-6000).

If you have questions related to this resource or need other assistance with the Federal Electronics Challenge, please contact your Regional Champion: <http://www2.epa.gov/fec/technical-assistance>.

Visit the FEC online: <http://www2.epa.gov/fec/>

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