Institute for Certification of Sustainable Recyclers

CORR Protocol Evaluation Report

MRF: Broad Run Recycling, LLC

Evaluation Body: Accountable Recycling Options, LLC

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To: Nelson, *Broad Run Recycling, LLC*
From: Joseph Abrahams, *Accountable Recycling Options, LLC*
Subject: Broad Run Recycling, LLC Evaluation Report
Date: May 29, 2012
Eric

Executive Summary

The following report is in reference to the evaluation of the application by the material recovery facility (MRF) Broad Run Recycling, LLC (BRR), located at 9220 Developers Drive, Manassas, Virginia, to the Institute for Certification of Sustainable Recyclers (ICSR) for CORR certification through the evaluation body, Accountable Recycling Options, LLC (ARO).

As an ICSR accredited Evaluation Body, ARO evaluated BRR per the guidelines outlined in the ICSR General Reporting Protocol 1.0.1 (GRP), ICSR General Evaluation Protocol 1.0.1 (GEP), ICSR Evaluation Manual 1.0.1 (EM), and ICSR General CORR Protocol 1.8 (GCP).

The quantitative materiality threshold applied to the recovery and recycling data submitted by BRR for the purposes of this evaluation was 95% (less than 5% error) per EM Section 2.5.

Facility Overview

BRR operates a 26,000-ft^2 construction and demolition waste (C&D) MRF that services, primarily, northern Virginia. Also located on the same 6.27-acre property is Industrial Disposal Service (IDS), a C&D hauling company. Every waste hauling truck that enters the property immediately drives onto the truck scales. The electronic environmental data management system (EMS), WAM Software's WAM-Hauler (WAM), electronically records the trucks full weight. The truck then drives to the sorting facility and dumps its load before returning to the scales upon exiting the premises.

In the sorting facility, a bucket loader aids in forming a neat pile from the newly dumped material. After finished, an excavator picks up the material and places it into a hopper to begin the process of material separation. The materials pass through a series of screens first separating materials into those over and under 8-inches in diameter. Items smaller than 8-inches are passed through a magnetic extractor and then to a de-stoner to remove any excess aggregate. Items larger than 8-inches move to a manual sorting line. The larger items are hand sorted by pickers and dropped into the appropriate bunkers. The following materials are removed from the sorting line at completion of the sorting process:

Wood

Metal

Aggregate

OCC

Biofuel

Trash

Stump/mulch/carpet

Development of Evaluation Plan

In support of their application, BRR supplied the follow documents to ICSR which were made available to ARO for review:

1. Completed ICSR Application for Certification as a Sustainable Recycler

Monthly Recycling Charts

Plan of Operations

Re-Zoning Permit

Special Use Permit

Virginia Environmental Quality Permit

ARO reviewed the aforementioned materials seeking that all eligibility requirements outlined in the EM had been met. Additionally, ARO looked for areas with a high risk of potential systematic weakness. With this in mind, ARO sought to:

1. Tour the facility

Verify BRR holds all applicable required permits

Verify accuracy of the scales used

Verify the calibration frequency of the scales used

Verify that are loads are sorted accurately

Verify the process train

Learn the process by which the data from the EMS was transferred to the reporting spreadsheets and that quality control (QC) exists

Procure the electronic spreadsheets used to calculate the mass-balance data provided and check the accuracy of the formulas contained therein

Procure sales receipts and invoices to back-end markets and cross reference with reported materials out

Site Visit

On March 28, 2012 ARO completed an on-site evaluation of BRR's facility. Managing Partner Kevin Herb conducted a tour of the facility, introduced the BRR staff, and gave a verbal description of daily operations. ARO personnel fully examined the physical extent of BRR's facility including a walk through of the sorting machinery and picking line. ARO requested and received a live demonstration of the scales in use and was able to witness first-hand the EMS scale integration. ARO kept a photographic record throughout the site tour.

After the tour, ARO was given access to BRR staff. ARO interviewed select staff and questioned them on the initial and reoccurring training processes and QC procedures in place at BRR. ARO used this information to determine if adequate QC exists in the positions that have direct impact on the management and reporting of the recycling and recovery rates.

ARO was allowed to examine the original required permits held by BRR. Additionally, ARO reviewed hard copies of back end-market sales receipts and invoices to cross-reference with material sales used to calculate the reported recycling and recovery rates.

Regulatory Compliance Test

All permits required to operate are unencumbered.

During the site visit, ARO confirmed the existence of the Virginia Department of Environmental Quality permit, Special Use permit, and Re-Zoning permit. ARO confirmed that there have been no communications from any regulatory agencies within the twelve-month reporting cycle concerning noncompliance with the regulations governing the operations of BRR. No irregularities involving management or employees who have a significant role in internal controls, or that could have a material effect on the reporting of recycling rates by BRR, were found. Based on the aforementioned review, ARO concludes that the facility satisfies the Regulatory

Compliance Test.

Use of Scales

BRR accounts for materials on a weight-only basis.

During the site visit, ARO confirmed the existence of scales at BRR. As outlined above, all trucks entering and leaving the facility are required to be weighed. The weight information is electronically stored in the EMS. BRR has scales calibrated on a yearly interval. To ensure the accuracy of the scales, ARO requested a copy of the most recent Vehicle Scale Calibration Report. The report indicated that one of the eight load position cells misreported the weight by 20-lbs (the minimum measurable delineation) when measuring a 25,000-lbs load. Loads of 9000-lbs resulted in no error. Though ICSR recommends quarterly scale calibration for applicant facilities, given the limited scale variance over the proceeding year and the accuracy of the remaining 7 load position cells, ARO deemed the error immaterial and concludes that the scales and current yearly calibration interval satisfy the requirements outlined by the GRP.

Supporting Data for Rate Estimates

BRR uses a ticketless EMS system and retains hardcopy sales receipts to back-end markets.
Having reviewed the monthly mass balance tables and computed recovery and recycling rates provided by BRR in support of their application, ARO sought to substantiate the data contained therein. ARO was provided with printouts from the EMS whose weights corresponded to the daily mass entries on the mass balance tables. ARO crosschecked the data from the printouts directly with the EMS system to ensure accuracy. ARO reviewed sales invoices and receipts from back-end markets to further determine that the materials reported as leaving the facility matched the outbound weights on the EMS and calculation spreadsheets. Following the site visit, ARO conducted phone interviews with sample backend markets to further verify the legitimacy of the recorded outbound material. Based on this review, ARO concludes the existence of the required supporting data for rate estimates as required by the GRP.

Data Transcription and Management

Ample QC exists for creation of reuse and recycling rate tables from EMS data.
During the site visit, ARO learned through interview the method by which the reported mass balance spreadsheets are generated. Using the daily EMS reports, a managing partner hand enters the reported weights into an Excel spreadsheet used for internal accounting. At the end of the reporting period, another managing partner modifies this spreadsheet for use and submittal to ICSR. At this time the entered spreadsheet data is crosschecked with the original EMS data for errors. Given the capacity of the individuals involved in the data entry, importance of the monthly spreadsheets for internal accounting usage, and monthly cross-check by senior management, ARO concludes that

ample QC exists for data transcription and management per the GRP.

Individuals Properly Trained for Functions They Perform

BRR employees receive adequate in-house initial and reoccurring training.

BRR offers both initial and reoccurring training for all BRR employees. During the site visit ARO substantiated the training procedures through direct interviews with select employees. Additionally, Managing Partner Eric Nelson holds the Virginia Public Weighmaster Permit and oversees scale operation. Given the automation of the EMS, the absence of weight tickets, and the limited ability of employees to introduce errors in the reporting system, ARO concludes that BRR has provided employees adequate required training per the GRP.

Performance Standard Test

Reported reuse and recycling rates are within 5% allowed threshold.

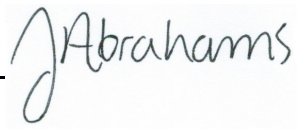
ARO requested electronic copies of the Excel spreadsheets used to generate the monthly mass balance tables in order to confirm the validity of the formulas contained therein. Upon confirming the accuracy of all spreadsheet calculations, ARO complied the sheets into a yearly mass-balance table for the annual recycling and recovery rate calculations required per the GRP. ARO crosschecked the daily entries in the spreadsheets with ARO's hand calculations based on the EMS data. The rates information submitted by BRR fell within the 5 percent tolerance threshold defined per the GRP. ARO concludes that BRR's reported Reuse and Recycling rates satisfy the Performance Standard Test required per the GRP.

Evaluation Statement Overview

Given the aforementioned findings submitted during the applications process and confirmed during the on-site visit and subsequent review, ARO finds that BRR meets all eligibility requirements, is in accordance with all measurement and record-keeping requirements, and has no existing material non-conformances or misstatements in its reported data. ARO recommends that the Reuse and Recycling rates submitted by BRR be certified as Real Rates as outlined in the GRP per ICSR CORR protocol.

The undersigned hereby certify as follows: the information provided herein is true, complete, and accurate, they have read and understand the protocols developed by ICSR, and are familiar with the requirements of ICSR. Furthermore, they also certify that any signatories duly elected, qualified, and acting officers of their respective organizations and that their organizations agree to be bound to the protocols of ICSR.

For Accountable Recycling Options, LLC:

By 

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