RECYCLING CERTIFICATION INSTITUTE

florinperkins
public disposal site

FLORIN PERKINS PUBLIC DISPOSAL SITE
(Florin Perkins)

CORR PROTOCOL EVALUATION REPORT

August 4, 2014
Evaluation Body: RCI

Executive Summary

This report corresponds to the evaluation of the application for CORR Certification submitted to the Recycling Certification Institute (RCI or Institute) by the Florin Perkins Public Disposal Site (Florin Perkins) located at 4201 Florin Perkins Road, Sacramento, CA. Florin Perkins is owned and operated by Zanker Road Resource Management, Ltd. (ZRRML).

Due to an updated online application process and a restart of the Institute in California, this Evaluation was conducted by RCI's Executive Director. In addition to the evaluation itself, this effort served to test the revised Application process and determine if any changes would be incorporated into training for Evaluation Bodies as evaluations would typically be performed by RCI-trained Evaluators. This Evaluation represents an independent review of data and information provided to the Institute. Due diligence was followed to ensure Duty of Care and Duty of Loyalty to the Institute and to manage any Conflict of Interest.

RCI General Reporting Protocol 1.0.1 (GRP), RCI General Evaluation Protocol 1.0.1 (GEP), RCI Evaluation Manual 1.1 (EM), and RCI General CORR Protocol 1.9 (GCP) were used to guide the evaluation process as is standard practice for all Evaluations.

The evaluation found neither material or immaterial misstatements nor deviations from the described process train for the operations at the Florin Perkins site. The Institute uses a 95% confidence level as its Minimum Quality standard when calculating recovery or recycling rates using the weights of materials recovered and recycled. The twelve months of recovery and recycling data submitted by Florin Perkins was within the quantitative materiality threshold of 95% (less than 5% error) per EM Section 1.6.5.

Overview of Florin Perkins Facility and Operations

ZRRML currently owns and operates the Florin Perkins Public Disposal Site located at 4201 Florin Perkins Road, Sacramento, CA. Under former ownership, the Florin Perkins Landfill was a 106-acre unclassified, unlined landfill on Florin Perkins Road in the City of Sacramento and operated as a landfill, transfer station, and a materials recovery facility on a 160-acre parcel. The site occupies a former gravel quarry. The WDRs only authorize the discharge of inert wastes into the landfill. To date, approximately half of the total disposal area has been filled. Prior to ZRRML ownership and management the site had been associated with various and significant permit violations.

In 2008, ZRRML began the extensive permitting process to turn the old Florin Perkins Landfill into an extensive construction and demolition debris recycling operation. The Florin Perkins Public Disposal Site (Florin Perkins) currently holds permits/licenses from State of California Regional Water Quality Control, Dept of Toxic Substances Control, CA Dept of Food and Agriculture, and CalRecycle (formerly the CIWMB), is also regulated by the County of Sacramento Environmental Management Dept (as the Local

Enforcement Agency), and is specifically permitted to accept and process Construction and Demolition Debris (C&D) as well as other mixed debris from contractors, haulers and homeowners. The site also accepts source separated wood waste, sheetrock, concrete, soil, asphalt shingles, wood shingles and demolition debris. Its design capacity is 500 tons per day.

As currently permitted, Florin Perkins may operate between the hours of 6AM to 6PM Monday through Sunday. Florin Perkins accepts wastes between the hours of 6AM to 4:45PM on weekdays and 8AM to 3:45PM on weekends, and is open 361 days per year with closures on Easter, Thanksgiving, Christmas and New Year's Day. The sorting line runs as needed depending on the incoming flow of mixed materials. It generally runs an average of five (5) days per week and eight (8) hours per day. Florin Perkins can accept up to 500 tons per day of solid waste. Current permit conditions require that waste materials be removed from the site within 24 hours of receipt. Separated recyclables must be removed within 7 to 60 days depending on the material type. All tipping, processing and material storage occurs within a 2.5 acre portion of a 10-acre permitted facility boundary.

Florin Perkins processes an extensive amount of mixed debris and debris boxes daily through a 140-foot long C&D sorting conveyor system. The system is utilized to remove a variety of materials; up to 16 products from the typical mixed waste stream. The sorting conveyor system, which includes elevated work-stations and a disc-screen, is located above storage bunkers that hold recovered materials. When the storage bunkers become full, the materials are routed for additional on-site processing, or loaded and hauled to approved recyclers. Residual materials are routed to a landfill for disposal. The sorting system is capable of sorting 40 tons per hour with an average 70% to 90% diversion rate. The diversion rate and tons per hour vary depending upon the type of materials sorted.

Mixed C&D and Mixed Debris

The sorting conveyor system is capable of accommodating both mixed C&D wastes and mixed wastes from residential and commercial sources. The sort line configurations are dependent on the waste material being processed. For example, fewer debris boxes are placed underneath the sort line when processing mixed C&D debris to create more capacity for wood. The mixed debris wastes contain more plastics and fibers, so additional debris boxes are placed under the sort line to accommodate those materials.

Each source is stockpiled separately near the sort line. The load checker directs each customer to tip near the appropriate pile. The load checker inspects the loads for unacceptable or hazardous materials. Large items such as appliances, sofas, mattresses and plastics sheets/tarps are removed from the waste stream with the use of an excavator prior to feeding the materials into the sorting system. Electronic wastes and tires are removed prior to processing. A wheeled loader is utilized for pushing materials into the pile.

An excavator is utilized to feed the sort line from an elevated platform. The material is evenly spread onto the in-feed conveyor which feeds the first incline conveyor. Materials then run over a disc-screen that tumbles and screens out the 3-inch minus fraction (fines) of the waste stream. The fines drop into a bunker and are stockpiled prior to shipment offsite. The larger materials (overs) continue onto the second incline conveyor and onto the main sorting platform. The sorting platform may be staffed with up to 18 sorters who are responsible for extracting specific items from the waste stream. Extracted materials will fall through a chute to a bin or bunker below where they are later moved to their designated storage locations within the permitted operations area until transferred offsite. Residuals fall off the end of the sorting conveyor into a residuals bunker and loaded onto transfer trailers. Inert debris (concrete, brick, stone, etc.) from the sort line are stockpiled nearby and ultimately transferred onsite for beneficial use.

Source Separated Wastes

Customers are directed to the designated areas to deposit their wastes. Source separated wastes include wood, brush, inert debris, sheetrock, carpet/padding, mattresses and roofing debris (composition and wood shingles).

Wood and Brush is transferred out to a nearby grinding contractor to produce cogeneration fuel and mulch products.

Inert Debris is utilized onsite for pad construction, road repair and other beneficial uses onsite. Inert debris is transferred onsite with the use of a roll-off truck.

Sheetrock is transferred to a facility that produces soil amendments.

Carpet and Padding once determined to be free of debris, is placed into debris boxes. These items are shipped offsite via transfer trailers or roll-off trucks to the appropriate processor. Commercial carpet tiles are generally palletized prior to shipment.

Mattresses are stripped of metal with the use of an excavator. The metal is placed in the metals stockpile and the remaining debris is pushed to the residuals bunker.

Roofing Debris such as composite asphalt roofing and wood shake roofing are commingled in a bunker. A tracked dozer tractor is utilized to trample the roofing into smaller fractions. A loader will push this material into the mixed C&D debris stockpile near the sort line. This material is run through the sort line to screen out the fines and to extract wood and metals.

Development of Evaluation Plan

Florin Perkins initiated the Certification process by first Registering its mixed C&D line on RCI's Registration webpage: https://www.recyclingcertification.org/registration/. The new Registration process requires facilities to submit facility and contact information which provides RCI with a general understanding of the on-site operation(s) and what additional information may be needed in preparation for an Evaluation. A sample of information provided through the Registration process includes:

- Name of the facility
- Street address of the facility (P.O. Box not acceptable)

- Name of the city/state where the facility is located
- Facility type
- Scale(s) certified or not
- Permits – state/local Registration Number or state/local permit number
- Hours of facility operation
- Current tons of Inbound and Outbound materials
- Name of company contact person, their position/title, and contact information
- Website address

Following completion of the Registration process, Florin Perkins completed and submitted the Application for Certification, available on RCI's Resources page. RCI conducted an interview with Florin Perkins regarding submittal of documents that would be used in preparation for the Evaluation. Key elements of this information can be found in the CORR Protocols Edition 1.9, Appendices A and B, viewable on the RCI website Resources page. RCI also provided an overview of the Evaluation process to aid in the streamlining and completion of activities on the day of the site visit. On-site review would include:

- Review of recyclables sales records
- Sales contacts to verify facility sales and other off-site movement of materials
- Confirmation of permits
- Verification of use and accuracy of scales including calibration frequency
- Observation and verification of load/material sorting and accuracy
- Interviews with key personnel
- Review of employee training/safety manuals
- Calculation of variance in recovery and recycling rates
- Other materials/documentation that may aid in preparation of a Facility Evaluation Report and Evaluation Opinion.

RCI reviewed twelve prior months' data for the Florin Perkins site to determine accuracy of the mass-balance calculations. Florin Perkins provided Excel spreadsheets that allowed for calculations and data review as well as determination of random sampling to occur during the site visit including weight tags, days, dates, materials, tons, etc. RCI noted areas of potential risk to follow up on during the site visit.

SITE VISIT

RCI performed an on-site evaluation of the Florin Perkins mixed C&D line operations. Abel Pereira (Operations Manager) and Aaron French (Manager of Business Development) conducted the tour of the facility. Mr. French served as Florin Perkins' lead contact throughout the Evaluation process and was responsible for submitting the initial applications and responding to subsequent inquiries as well. RCI did a full walk-through of the facility, examining where materials enter, are measured, deposited, processed/sorted, and eventually leave the facility.

The review included the follow-up questions from the initial review of data. Interviews of staff associated with the key areas of the operations, in particular, those staff who have access authority and responsibility for maintaining, reviewing, and overall integrity of Florin Perkins' data, were conducted. RCI also reviewed the training manuals to determine if adequate QC existed for those staff with the potential to directly affect the recycling and recovery rates reported by the facility and determined adequate and ongoing training exists in these key positions to maintain QC of processes and data.

During the review it was determined there were some minor discrepancies in the transcription of data from Florin Perkins' EMS to RCI's website and RCI was unable to complete the Evaluation in a single site visit. In the mass balance equation of the facility using the twelve months of data provided, these discrepancies were determined to be immaterial. However, Florin Perkins resolved the discrepancies, wrote, and implemented a procedure for the transcription process. RCI developed a sampling process based on the corrected transactions and conducted a second site visit (July 3, 2014) and verified the procedure and data correction.

Regulatory Compliance Test

Florin Perkins possesses the necessary permits to operate.

Florin Perkins has operated as a resource recovery facility and disposal site since 2008 under various Permits issued by the Central Valley Regional Water Quality Control Board and California Integrated Waste Management Board (CIWMB, now CalRecycle). Air quality permits for stationary emissions are not required as the equipment in operation is below the threshold for permitting. In the past twelve months there have been no communications from regulatory agencies regarding non-compliance with permitted operations or other regulations governing the operations of this facility. No irregularities were found involving management or employees who have a significant role in internal controls, or that could have a material effect on the reporting of Florin Perkins' recycling rates.

Use of Scales

RCI concludes that the facility satisfies the requirements for use of scales.

The scale house is equipped with one inbound and one outbound truck scale. All inbound and outbound transactions are tracked through Florin Perkins' scale operating system and managed by certified weighmasters as verified by RCI.

Materials In

All incoming loads are assessed to determine origin and waste type. Loads over 5 cubic yards are weighed, while loads under 5 cubic yards are measured to determine volume, applying Title 14 California Code of Regulations Section 17402 for in-vehicle density to determine weight of measured loads. The driver proceeds to the appropriate location in the facility to empty the vehicle. A load checker confirms the materials as they are deposited in the tipping area. If the materials do not match the materials

identified on the driver's tag, the load checker notifies the driver and radios the scale house to make the correction.

Materials Out
All outbound transactions are weighed. Each scale ticket contains a numeric ticket number, date, time, origin, commodity type, comments (if applicable), tare, gross and net weights and measurement units (tons, cubic yard, each, etc.).

All Inbound and Outbound data is automatically entered into Florin Perkins' electronic data management system (EMS) connected to the main office also onsite. Florin Perkins' scales are calibrated at least twice per year by a scale contractor licensed by the State of California. RCI reviewed a sample of weight tags in the scale house and in the main office to verify accuracy of the EMS as well as the process for any subsequent manual adjustments.

Supporting Data for Rate Estimates

RCI concludes Florin Perkins maintains required supporting data as required by the GRP for recycling and recovery rate estimates.

Florin Perkins uses an EMS system and retains hardcopy receipts for incoming and outgoing materials/ markets. Florin Perkins provided twelve months of electronic reports (mass balance) for RCI's inspection. RCI selected twelve months of transaction records for sampling to substantiate and crosscheck entries in the electronic reports with hard copies to ensure accuracy. A sampling of customers was selected to further confirm the disposition of materials recorded as having left Florin Perkins.

Data Transcription and Management

Sufficient QC exists for creation of reuse and recycling rate tables from EMS data.

RCI interviewed Florin Perkins' Business Development and Data Managers regarding the EMS and the generation of all reports as well as supporting mass balance spreadsheets. Material data is automatically entered into the system for accounting purposes. These reports are reviewed to verify accuracy as well as hand enter and/or correct any manual adjustments as determined through the normal course of business.

The spreadsheets are generated by the Data Manager and a final cross-check is provided by the Manager of Business Development before submittal (uploading) to RCI. Based on the critical need for accurate monthly spreadsheets for internal and customer accounting, Florin Perkins' verified procedure, observed competencies, as well as ongoing training of the individuals involved in the data entry, and final crosscheck , RCI concludes that sufficient QC exists for data transcription and management per the GRP.

Individuals Properly Trained for Functions They Perform

Florin Perkins employees receive adequate in-house initial and recurring training, including training from outside sources.

RCI reviewed the training schedules and modules/materials as well as conducted interviews with key employees during the site visit.

Initial training and refresher courses occur as required to comply with federal, state (for instance, 27 CCR 20610 and 20590), and Florin Perkins' requirements. Records documenting employee training are maintained for a period of 3 years, or for the duration of their employment, whichever is longer.

Specific training is also required for the Florin Perkins load-checking program. Florin Perkins designates and trains inspectors and backup personnel to conduct random load-checking inspections. Employees involved in load-checking activities are trained in the program procedures, and the health and physical hazards associated with hazardous and infectious waste. Load-checking personnel are trained in the identification of, and procedures for, handling hazardous and prohibited wastes. In general, all site personnel are trained to identify and report any suspicious loads.

Training records identify all key information on employees' training including documentation by the trainer of successful completion. RCI observed these employees in the scale house and designated tipping areas. Materials were properly categorized and directed and the load checker maintained contact with vehicle drivers and the scale house as appropriate. Employees were observed utilizing proper safety equipment and appropriate signage was posted as required by Cal-OSHA.

Based on the observations of staff, the work areas, and the initial and ongoing training of Florin Perkins employees, RCI concludes that Florin Perkins provides employees with the requisite training per the GRP.

Performance Standard Test

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

RCI requested electronic copies of mass balance spreadsheets for Florin Perkins before scheduling a site visit. RCI reviewed the files and noted areas requiring clarification. Several phone meetings with Florin Perkins' Manager of Business Development (French) were conducted to review RCI's questions related to the twelve-month mass-balance and monthly entries, as well as to discuss how Florin Perkins would upload the information into RCI's web-based reporting system. Formulas were reviewed and their validity tested and select transactions were indentified for further review during the site visit. The recycling and recovery rates information submitted by Florin Perkins fell within the 5 percent tolerance threshold defined per the GRP. RCI concludes that ZMPF's reported reuse and recycling rates satisfy the Performance Standard Test required per the GRP.

Evaluation Statement Overview

Based on extensive review of data from Florin Perkins' Mixed C&D Recycling operation, the findings according to RCI protocols via the evaluation process, and the on-site visit and interviews with key staff, RCI finds that Florin Perkins' Mixed C&D Recycling operation meets RCI's eligibility requirements, is in compliance with all measurement and record-keeping requirements, and has no existing material or significant immaterial non-conformances or misstatements in its reported data. RCI hereby certifies the Reuse and Recycling rates submitted by Florin Perkins as Real Rates as outlined in the GRP per RCI CORR protocol.

The undersigned hereby certify that the information provided herein is true, complete, and accurate; they have read and understand the protocols developed by RCI, and are familiar with the requirements of RCI. 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 RCI.

For Recycling Certification Institute:

By

Stephen M Bantillo
Print Name

Executive Director
Title

August 4, 2014
Date

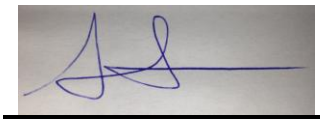
By

Print Name

Title

Date

For Florin Perkins Public Disposal Site



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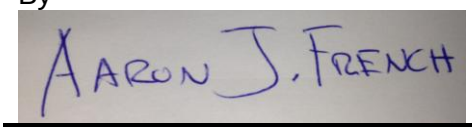

Print Name

Manager of Business Development
Title

8/6/2013
Date