



# RECYCLING CERTIFICATION INSTITUTE



***PREMIER***  
***R E C Y C L E***

PREMIER RECYCLE FACILITY  
260 LEO AVE  
SAN JOSE, CA 95112

## CORR PROTOCOL EVALUATION REPORT

**R3** CONSULTING GROUP, INC.  
RESOURCES • RESPECT • RESPONSIBILITY



June 15, 2018

Evaluation Body: R3 Consulting Group

## **Executive Summary**

This report corresponds to the evaluation of the application for CORR Certification submitted to the Recycling Certification Institute by the Premier Recycle Facility (Premier) located at 260 Leo Ave in San Jose, California 95112. The Premier Recycle Facility is a large volume transfer/processing facility that is owned and operated by Premier Recycle Company.

This evaluation was conducted by R3 Consulting Group, Inc. (R3) which is a certified evaluating body of RCI and 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 potential Conflict of Interest. The RCI Evaluators Manual and RCI General CORR Protocol were used to guide the evaluation process, as is standard practice for all evaluations.

RCI utilizes a 95% confidence level as its Minimum Quality standard when calculating recovery or recycling rates using the weights of materials recovered and recycled. The evaluation found neither material or immaterial misstatements nor deviations from the described process train for the operations at the Premier Recycle Facility, and the 2017-18 recovery and recycling data submitted by Premier was within the quantitative materiality threshold of 95% allowed.

## **Overview of the Premier Recycle Facility and Operations**

The Premier Recycle Facility (Premier) is a large volume transfer/processing facility located at 260 Leo Ave in San Jose, California 95112. The California Code of Regulations, Title 14 (14 CCR), Section 17402 (a)(8) defines a large volume transfer/processing facility as “a facility that receives 100 tons or more of solid waste per operating day for the purpose of storing, handling, or processing the waste prior to transferring the waste to another solid waste operation or facility. Premier’s facility operations currently include acceptance of construction and demolition wastes, which include mixed C&D, metal (ferrous and non-ferrous), plastic, cardboard (OCC), wood, fill/inert(s), concrete, and drywall. Premier does not accept municipal solid wastes, liquid wastes, dead animals, paint, sludge, or hazardous wastes.

Premier collects materials exclusively from construction companies and independent contractors that specialize in construction and demolition work. Collection is made via roll off trucks and drop boxes. The facility also contains a five (5) pump water retention system to ensure that there is zero waste water run-off which is covered under their Stormwater General Permit (WDID# 2 43I016004).

The City of San Jose business license (No. 0033821210) issued to Premier expires January 15, 2019. The weighmaster license (No. 011098) issued by the Department of Food and Agriculture expires July 1, 2018 and lists three (3) Deputy Weighmaster(s). Premier is permitted under the City of San Jose Department of Planning, Building, and Code Enforcement Solid Waste Facility Permit No. 43-AN-0023. The facility is permitted

to operate as a Transfer/Processing Facility (MRF) 24 hours per day, Monday – Sunday, with a start time of 12:00am. The facility is allowed to receive materials from Premier vehicles between 3:00am to 6:00pm (Monday – Sunday) and from contracted, non-Premier vehicles between 7:00am to 5:00pm (Monday – Sunday). Premier is permitted a maximum tonnage of 550 tons per day through the gate. All tipping, sorting, and processing must be performed within the 1.75 acres of permitted area. Premier is also permitted to collect materials in the City of San Francisco (No. FR-04-05).

### **Mixed C&D and Source Separated**

Premier is permitted to accept commingled loads of construction and demolition debris. As drivers enter the facility, they park and remove the tarp from the load, prior to entering the scale. The driver gives the work order to the scalehouse and receives a weight ticket once the information is entered into the PC Scales software suite. Additionally, the waste classification, county of origin, company name, time, and truck/tag number are recorded. The driver is directed to the tipping area by floor personnel and dumps the load. Once the driver dumps the load, the site foreman photographs the load (for entry into PC Scales with the associated ticket number) and then directs the loader driver where to push the material(s). Although the ticket classifies one (1) material, the site foreman estimates the actual percentages of the load breakdown and enters that information into PC Scales as well. The truck driver is directed back to the scale with the empty container and receives a weigh-out ticket before exiting the facility.

Source separated materials are directed to the bunkers in which they will be placed, and mixed C&D loads are dumped in the center of the site to be separated by floor personnel. Any loads deemed to contain 90% or more contaminated materials are directed to the far corner of the facility and are defined as trash/residual. There are six (6) fire hoses strategically placed within the site to ensure that every inch of the site can be sprayed if needed; these hoses are primarily used to spray each load that comes through the facility as a means for dust control but are available for emergencies (fire) as well.

**Cardboard (OCC)** Clean cardboard is collected and stored in a bunker until the material is loaded into a transfer vehicle for delivery to a third-party facility.

**Drywall** Clean drywall is collected and stored in a bunker until the material is loaded into a transfer vehicle for delivery to a third-party facility.

**Concrete** Clean concrete is collected and stored in a bunker until the material is loaded into a transfer vehicle for delivery to a third-party facility.

**DConc** Mix of dirty concrete, porcelain, dirt, rock, and brick is collected and stored in a bunker until the material is loaded into a transfer vehicle for delivery to a third-party facility. This material is the closest thing that Premier has to “fines” except that it contains zero trash.

**Metals (ferrous & non-ferrous)** Metals are collected and stored in a bunker until the material is loaded into a transfer vehicle for delivery to a third-party facility.

**Mixed C&D** Mixed C&D loads are dumped into a reserved area in the middle of the yard to allow for optimal visual inspection. During the visual inspection each material type present is listed and assigned an estimated percentage of the total load. Following the percentage breakdown, a photo is taken to attach to the accompanying weight ticket in PC Scales. Sorters then separate the material and relocate to their respective bunkers. Any material that is not recyclable is relocated to the Residual Bunker.

**White Paper** Clean paper is collected and stored in a roll off container and then is delivered to a third-party facility. Container takes about an average of three (3) months to reach capacity.

**Wood** Clean wood is collected and stored in a bunker until the material is loaded into a transfer vehicle for delivery to a third-party facility. Floor personnel strip wood of anything that may cause an issue for a shredder, such as doorknobs or hinges.

**Residuals** Residual debris is collected in a bunker in the far corner of the facility and is delivered via transfer truck to a landfill for disposal.

## Development of Evaluation Plan

Premier Recycle Facility initiated the Certification process by first Registering its Mixed C&D Line on RCI's Registration webpage: <https://www.recyclingcertification.org/registration/> and subsequently submitted an Application for Certification. The application included monthly and annually detailed and summarized tonnage reports, lists of markets (material recipients and their contact info), and a variety of other background documents. Other information provided through the intake 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 (required)
- 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

RCI conducted an interview with Brock Hill (Vice President), 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 included:

- Tour of the facility
- Verify process train of materials as stated in Application for Certification
- Verify proper sorting and storage of the materials
- Verify use and calibration frequency of certified scales
- Observe and verify weighing of materials and electronic storage of information
- Observe and verify load/material sorting and accuracy
- Observe and verify QC measures are in place to ensure accuracy in recovery and uploading of facility data
- Review of recyclables sales records
- Confirmation of permits
- 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

Premier Recycle Facility submitted twelve prior months' data for RCI's review to determine accuracy of the mass-balance calculations. The facility provided excel spreadsheets derived from exported data from their PC Scales software. The spreadsheets allowed for calculations and data review as well as random sampling of weight tickets to test for accuracy.

## **SITE VISIT**

R3 Consulting Group, Inc., a certified RCI evaluating body, performed an onsite evaluation of the Premier Recycle Facility. Brock Hill (Vice President) served as lead contact for the facility throughout the evaluation process and conducted the facility tour during the onsite evaluation. Mr. Hill also initiated the certification application process. R3 observed all operations and processes during a full walk-through of the facility, examining where materials enter, where they are weighed, deposited, sorted/processed, and ultimately exit the facility.

The onsite review included follow-up questions from the initial review of data, visual inspection of all necessary permits/certifications, interviews with key personnel (those that are vital to the integrity of material processing and recording), review of documentation processes, and the flow of materials. R3 also reviewed the facility's Injury and Illness Prevention Program and safety training program and materials.

All operations and processes for the facility are handled onsite, except for billing, which is handled at the corporate office located at 348 Phelan Ave in San Jose, California 95112.

## **Regulatory Compliance Test**

*Premier Recycle Facility possesses the necessary permits to operate.*

The Premier Recycle Facility has operated as a resource recovery facility under the current permit since 2013. R3 conducted a review of correspondence between Premier and the Local Enforcement Agency (City of San Jose Department of Planning, Building, and Code Enforcement) between April 2017 and April 2018. There was one documented instance of noncompliance in the past twelve (12) months when the facility exceeded the daily allowable tonnage limit on July 25, 2017. Please note that the LEA did not inspect the facility during the month of December 2017.

## **Use of Scales**

*R3 Consulting Group, Inc. concludes that the Premier Recycle Facility satisfies the requirements for use of scales.*

The scalehouse is equipped with one scale that is utilized for both inbound and outbound weighing. All transactions through the scalehouse are managed and maintained in the facility's scale operating software system, PC Scales. The scale is operated only by those employees certified as Deputy Weighmasters.

Premier uses a 60-ton capacity Rice Lake IQ710 scale system. The scale is calibrated every six (6) months, with the last calibration occurring February 13, 2018 by Quality Scales Ltd. out of Byron, California. The registration number for the scale is 8102-1272.

All materials that pass over the scale are manually and electronically recorded. This method allows for error checking at the end of the day. Another measure that Premier implemented for quality control was the elimination of edits to weight tags. Any weight tag that requires an edit is voided and a replacement tag is created with the original tag number tied to it, as well as an added note depicting the reason for the void.

### Materials In

Information gathered on incoming material contains:

1. Customer Name
2. Origin City/County
3. Scale Ticket Number
4. Job Number (Site/LEED ID)
5. Truck Number
6. Date In
7. Inbound Material Type
8. Gross Weight

### Materials Out

1. Destination Facility
2. Scale Ticket Number

3. Truck Number
4. Date Out
5. Outbound Material Type
6. Gross Weight

### All Inbound and Outbound Data

All inbound and outbound data is entered into the facility's scalehouse software (PC Scales) for purposes of tracking, reporting, and data collecting.

### **Supporting Data for Rate Estimates**

*R3 Consulting Group, Inc. concludes Premier Recycle Facility maintains required supporting data as required for recycling and recovery rate estimates.*

Premier provided twelve (12) months of electronic reports for inspection. R3 randomly selected transaction records for sampling to substantiate the inbound and outbound tonnage entries to ensure accuracy. No tonnage accounting issues were found in the sample.

### **Data Transcription and Management**

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

R3 interviewed Premier's Vice President (Brock Hill) regarding their electronic data collection and report generation practices. Material data in the PC Scales software and information is queried for reporting purposes. The reporting information is entered into the "CDDD Report Calculator" Excel spreadsheet. These reports are reviewed to ensure accuracy.

The generated spreadsheets are created and reviewed by Mr. Hill before submittal to RCI. R3 verified Premier's procedures, observed the process from beginning to end, and reviewed data correction practices. R3 concludes that sufficient QC exists for the data gathering, management, and reporting practices of Premier.

### **Individuals Properly Trained for Functions They Perform**

*Premier Recycle Facility employees receive adequate in-house initial and recurring training, including training from outside sources.*

R3 reviewed the facility IIPP, training materials, and training schedule as well as conducted interviews with personnel key to safety during the onsite evaluation.

Initial training consists of a complete review and subsequent test on the company IIPP, as well as safety tests of the site-specific safety measures and policies. Records documenting employee training are maintained for a period of three (3) years.

Premier conducts quarterly safety training (third Friday of February, May, August, and November) on the topics of health and safety, identification and evaluation of hazards, accident investigation and reporting procedures, drug and alcohol awareness, Lock-Out/Tag-Out (LOTO), and the emergency action plan. Each hour-long quarterly meeting has an accompanying agenda that covers all the above topics, plus accident/injuries that occurred over the previous quarter and other information that the Safety Manager adds, as warranted. Another quarterly safety practice that Premier institutes is the selection of three crew members to the “Fire Response Team.” The Fire Response Team wears red hardhats (everyone else wears white) and are the first responders for any incidents related to facility fire(s) for that quarter.

During each meeting, a sign-in sheet is distributed and signed by all employees in attendance. If an employee is off duty during a quarterly safety meeting he/she must check in with the Safety Manager and review the meeting items covered before resuming job duties.

R3 observed Premier employees in proper PPE at all times during the onsite evaluation including the three designated to don red hard hats. The floor employee assigned to traffic control was observed as well and wore a distinct orange safety vest (all others were wearing yellow). Based on observation of the operation, R3 concludes that Premier provides employees with adequate and appropriate training.

### **Performance Standard Test**

*Reported recovery and recycling rates are within 5% allowed threshold.*

RCI requested electronic copies of mass balance spreadsheets from Premier prior to scheduling an onsite evaluation. The submitted files were reviewed and areas requiring further clarification were noted. Premier’s Vice President (Brock Hill) responded to all inquiries regarding questions concerning mass-balance reporting. Formulas were reviewed, and their validity tested and select transactions were identified for further review during the site visit. Trash typically is not included in the inbound tonnage reports of recycling facilities, however Premier includes inbound trash to accurately account for residual tonnage that comes off their sort line. The facility is not large enough to contain two separate segregated trash piles, thus the residue figure is derived from subtracting the Trash In from the Trash Out. While this process is not ideal, the inbound tonnage is only off by a figure less than 1%, which meets the 5% allowable threshold. R3 concludes that the reported reuse and recycling rates satisfy the Performance Standard Test required per the EM.

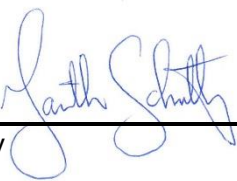
### **Evaluation Statement Overview**

Based on an extensive review of data from the Premier Recycle Facility’s Mixed C&D Processing operation, the onsite observation and interview of key staff, R3 finds that the Premier Recycle Facility operation meets RCI’s eligibility requirements. R3 also found Premier to be in compliance with all measurement and record keeping requirements and has no existing material or significant immaterial nonconformance or misstatements in its

reported data. R3 hereby certifies the Reuse and Recycling rates submitted by the Premier Recycle Facility as Real Rates as outlined in the EM 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 R3 Consulting Group, Inc.:

  
By \_\_\_\_\_  
Garth Schultz  
Print Name  
Principal and Lead Evaluator  
Title  
June 27, 2018  
Date

By \_\_\_\_\_  
\_\_\_\_\_  
Print Name  
\_\_\_\_\_  
Title  
\_\_\_\_\_  
Date

For Premier Recycle:

  
By \_\_\_\_\_  
Brock Hill  
Print Name

Director of Operations  
Title  
June 28, 2018  
Date