RECYCLING CERTIFICATION INSTITUTE

Hayward Transfer Station, LLC

CORR PROTOCOL EVALUATION REPORT

July 13, 2021
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 Hayward Transfer Station, LLC (HTS) on behalf of its Medium Volume Transfer/Processing Facility located at 3458 Enterprise Avenue, Hayward, CA 94545. HTS facility operations currently include acceptance of construction and demolition wastes, which include mixed C&D, metal (ferrous and non-ferrous), plastic, cardboard (OCC), paper, wood, fill/inerts, drywall, concrete, and other inerts. HTS does not accept municipal solid wastes, liquid wastes, dead animals, paint, sludge, e-wastes, or hazardous wastes. HTS receives public self haul C&D materials from construction companies, commercial businesses and demolition companies, independent contractors, and rolloff C&D loads from independent debris box haulers. The operation consists of several distinct areas where C&D materials are processed and segregated in bunkers until time for removal /transfer to markets or other recyclers. This evaluation focuses on the services related to the recovery of C&D brought to the facility by third-party customers.

This Evaluation was conducted by RCI and represents an independent review of HTS's data, operations, and other 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 Evaluators Manual 2.0 (EM) and RCI CORR Protocol 1.91 were used to guide the evaluation process as is standard practice for all Evaluations. This evaluation was conducted onsite during Covid-19. Prior to the evaluation, both HTS and RCI reviewed and agreed to follow industry accepted protocols to maintain safe distancing and sanitization to prevent the spread of Covid-19.

The evaluation found neither material or immaterial misstatements nor deviations from the described process train for the operations at the HTS site. RCI 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 HTS was within the quantitative materiality threshold of 95% (less than 5% error) per EM Section 2.5.

Overview of Hayward Transfer Station, LLC's Operations

The Hayward Transfer Station, LLC CD/I Facility is located at 3458 Enterprise Avenue, Hayward, CA 94545 and is owned by Todd Fitch, who also own the property upon which the facility is located. The site is currently shared with another business, Hanson & Fitch, who supplies temporary fencing, portable toilets and sanitation facilities, and temporary site fencing. The total property area is 3.4 acres, and area of specific use for HTS is 1.5 acres plus 1.0 acres of shared ingress and egress for HTS and the other operations. HTS is a medium volume transfer/processing facility as defined in the California Code of Regulations Title 14 (14 CCR), Section 17381 and is currently permitted to accept up to 174 tons per day.

HTS facility operations currently include acceptance of construction and demolition wastes, which include mixed C&D, metal (ferrous and non-ferrous), plastic, cardboard (OCC), paper, wood, fill/inerts, drywall, concrete, and other inerts. HTS does not accept municipal solid wastes, liquid wastes, dead animals, paint, sludge, e-wastes, or hazardous wastes. The facility has been operating at this transfer and processing capacity since July 2015.

HTS receives public self haul C&D materials from construction companies, commercial businesses and demolition companies, independent contractors, and rolloff C&D loads from independent debris box haulers. HTS is registered as a waste tire recovery generator, and a waste tire hauler for waste tires recovered during Facility operations.

The City of Hayward issued Administrative Use Permit No. PL-2014-0373 for the site use. CalRecycle, works through the County of Alameda Environmental Health Department Office of Solid Waste and Medical Waste as the LEA for enforcement for the issued Solid Waste Registration Permit CA SWIS #01-AA-0318. HTS has a current Weighmaster license with seven Deputy Weighmasters.

The facility is open to the public to accept materials six days per week, 7:00 AM to 4:30 PM Monday thru Friday, Saturday 8:00 AM to 4:00 PM, though it is permitted to be open longer hours than listed. HTS is closed Sundays, Thanksgiving, Christmas, New Year's Day, Labor Day, Easter, and open 6:00 AM to 12:30 PM Christmas Eve and New Year's Eve.

MIXED C&D – Desciption of Process Train

Drivers check in with the scale house weighmaster as they enter the facility. The weighmaster identifies the customer, vehicle license number, and obtains information about job site and contents of load. The weighmaster enters this info in HTS data management system using ScaleIt software, which automatically enters the ticket number, date, and time Inbound when the vehicle mounts the single scale at the facility which is used for both inbound and outbound weights. The customer untarps their load prior to entering the scale. After moving forward onto the scale, the weighmaster signals the driver the inbound weight has been recorded, and the customer drives off and proceeds to the tipping area.

The driver is directed to the appropriate tipping area by the spotter and discharges the load. All material unloading areas and bunker storage areas are on top of a concrete surface. The spotter visually checks the discharged load and directs the driver to reload any non-allowable materials. The spotter visually estimates the amount and type of recyclable material and any residual material in the load and calls the scale house. The weighmaster records this information on the weight ticket. The vehicle driver then returns to the scale to record empty weight, proceeds to the scale house to collect a copy of the weight ticket and provides/arranges any payment transaction, then exits the facility.

The sorters and equipment operators then recover and move the recyclable material from the discharged load by hand, and with the wheel loader and excavator to designated bunkers, and debris bins. The non-recyclable materials are then additionally worked over by excavator, and if appropriate type of material and size, are moved to a bunker by the wheel loader for use as AIC or ADC. The cardboard is moved from the tipping area by the skid steer loader to the baler loading area. The mini-excavator loads the cardboard into the baler, and is also a backup for the main excavator. The skid steer loader and forklift with tipping bucket also can load the baler. Any trash and remaining residual material in the tipping area is moved to a bunker to be disposed as residual and landfilled. Yard personnel include a site manager, 1-2 Deputy Weighmasters, 1 supervisor, 2 equipment operators, and 3-4 sorters.

Stored and processed material is loaded into transfer trailers by the excavator, weighed out, and sent to appropriate facilities. Cardboard bales from the baler roll out on a wheeled conveyor ramp, and a forklift moves the bales, and loads them onto a trailer for delivery to a recycler. All loads are weighed out, and sent to a third party recycler. The goal of the daily operation is remove from the facility as much material was brought in that day, and if possible basically 'clear the floor' by the end of the day.

The entire facility is paved with either concrete or asphalt and swept with the skid steer loader with hydraulic sweeping attachment regularly, plus a water truck is used to apply additional water on pavement when necessary. There are also impact head sprinklers mounted on the bunker walls, and ground hoses used to spray loads and material piles to control dust. A deluge water system is in place on the bunker walls which can be initiated and douse the bunker areas in case of fire.

Cardboard (OCC) Clean cardboard is separated and taken to the baler area, and baled. The bales are loaded onto a trailer and delivered to a third-party facility.
Concrete is separated and stored in a bunker until loaded into a transfer vehicle for delivery to a third-party.
Drywall Clean drywall is separated and stored in a bunker until it is loaded into a transfer vehicle for delivery to a third-party.
Inerts Unless a significant load of clean material is received mixed inerts *(tile, brick, rock, broken asphalt, dirty concrete)* are broken up by the excavator and stored in a bunker until loaded into a transfer trailer and delivered to the landfill for use as ADC or AIC.
Metals (ferrous and non-ferrous) Metals are separated and stored in a bunker, metal recycler trailer, and/or debris bin until the materials are loaded into a transfer vehicles for delivery to a third-party.
Rigid Plastics Rigid plastics, specifically buckets, with any handles removed, were being recovered, but there is currently no market, as well as no outlet, for this type material so it is not being recovered at this time and most ends up as residual.
Wood Clean wood is separated, laborers remove strip wood of anything that may cause an issue for shredder *(like hinges or doorknobs),* and stored in a bunker until material is loaded into a transfer trailer for delivery to a third party.

Residuals Residual debris is separated and stored in a bunker until the material is loaded into a transfer vehicle for delivery to a landfill for disposal.

Development of Evaluation Plan

HTS initiated the Certification process by registering its Mixed C&D line on RCI's Registration webpage https://www.recyclingcertification.org/registration/ and following a lengthy consultation with RCI, then subsequently submitted its Application for Certification. The application included twelve months of load level data, lists of markets (material recipients and their contact info), and a variety of other background documents. Other information provided through the intake review 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 – indication of state/local Registration or state/local permit
- Hours of facility operation
- Current tons of Inbound and Outbound materials
- Name of company contact person, their position/title, and contact information
- Website address

Mr. Richard Mauck (Consultant) was responsible for submittal of the Application for Certification and was lead in communications with RCI and in preparation of documents for and throughout the desk audit. Ms. Christian Trejo (Site Manager) was lead during the onsite Evaluation. Key elements of this information can be found in the CORR Protocol Edition 1.91, Appendices A and B, viewable on the RCI website Resources page. RCI provided a Draft Agenda with 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:

- 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
- Observation and verification of 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.

HTS submitted twelve prior months' data for RCI's review to determine accuracy of the mass-balance calculations. The spreadsheets allowed for calculations and data review as well as determination of random sampling including weight tags, days, dates, materials, tons, etc. RCI noted areas of potential risk on which to follow-up during the site visit.

SITE VISIT

RCI performed an on-site evaluation of the Hayward Transfer Station following agreed upon strict Covid-19 safety protocols on July 13th, 2021. Ms. Trejo conducted the tour of the facility as well as produced the requested documents for review.

RCI performed its walk-through examining where materials enter, are measured, deposited, processed/sorted, stockpiled, and eventually leave the facility.

The review included follow-up questions from the initial review of data. Key areas of the operations and the authority and responsibility for maintaining, reviewing, and overall integrity of HTS's data, were discussed with Ms. Trejo. RCI also discussed the training courses and records 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.

The facility and work site appeared well-organized and maintained. The overall flow of vehicles queuing at the scale house, scale, moving through the yard with direction from HTS staff for proper unloading, and weigh-out was orderly and efficient.

Bunkers for the different materials being sorted were clearly identifiable and the equipment operators effectively moved materials to the bunkers and kept the tipping areas clear for incoming loads.

Adequate signage was observed at the entrance to the facility and throughout the property regarding safety, material identification, and storage. Material piles were kept separate and were easily identifiable. Personnel were observed to be wearing appropriate personal safety equipment. A truck-mounted water tank was onsite for dust control, though no dust was observed during the site visit.

Regulatory Compliance Test

Hayward Transfer Station, LLC possesses the necessary permits to operate.

HTS operates under several permits and licenses issued by the State of California, Alameda County Dept of Environmental Health, DTSC, BAAQMD and others for handling solid and hazardous wastes.

There has been no substantiated material non-compliance with permitted operations or other regulations governing the operations of this facility in the past twelve months. 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 HTS's recovery and recycling rates.

Use of Scales

RCI concludes that Hayward Transfer Station, LLC satisfies the requirements for use of scales.

HTS utilizes a single scale to record inbound and outbound traffic. The capacity is 120,000lbs with 20lb cells. It is calibrated at least once per year and as needed with certification provided by Alameda County Weights and Measures.

HTS utilizes ScaleIt software, which includes 24/7 support. All scalehouse employees recording transactions are qualified designated Deputy Weighmasters. All materials that pass over the scale are electronically recorded, and records on each scale ticket contains, at a minimum, truck company, order number, date, time, load/material type, tare, gross and net weights.

Several reports are run at the end of each day to crosscheck transactions, payments received, number of loads, and inbound weights. Controls are in place limiting the ability to edit weight tags, and the customer is given a computer printed copy of the weight ticket before leaving the facility.

RCI verified the scale inspection, service, and calibration and confirmed the scale had been certified within the past twelve months.

Supporting Data for Rate Estimates

RCI concludes Hayward Transfer Station, LLC, Inc. maintains required supporting data as required by the EM for recycling and recovery rate estimates.

HTS retains electronic receipts for incoming and outgoing materials/markets and produces hardcopy receipts for customers. RCI observed HTS's customers as well as a HTS employee using the system at the scale and scale house to observe the system's operation and capability. HTS provided twelve months of electronic reports (mass balance) for RCI's inspection. RCI sampled from twelve months of transaction records to substantiate and crosscheck entries in the electronic reports to ensure accuracy.

Data Transcription and Management

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

RCI discussed with Mr. Mauck HTS' ScaleIt system, as well as the creation of RCI and supporting mass balance spreadsheets. RCI's initial review uncovered some areas of risk related to reporting accuracy and repetition. HTS' team addressed the area of risk and Mr. Mauck provided a Reporting Procedures Guide that includes scale operation and scale operator duties and detailed steps for reporting to RCI and oversight agencies. The guide has been reviewed by all employees associated with the data.

The Site Manager has the main responsibility for the RCI reports. Ms. Trejo demonstrated how the information is retrieved from the ScaleIt system and how reports are developed to enter HTS's monthly data into the RCI Certified Facilities report.

Individuals Properly Trained for Functions They Perform

HTS's employees receive adequate in-house training.

HTS' training program covers a broad range of relevant and fitting topics. RCI reviewed HTS' Training Logs and noted the training encompasses subjects such as safe operation of vehicles and equipment, International Roadcheck, self and coworker safety, hearing and eye protection, Lock-Out/Tag-Out, heat illness prevention, cell phones, a new Covid-related module—Keep Your Distance, and many others. A key element of training and preparedness is HTS' Emergency Action Plan, which has procedures and contact lists for any kind of emergencies that may occur onsite (medical, chemical, fire, electrical, volatiles, natural disaster, evacuation routes, etc.). HTS maintains its OSHA tracking and reporting.

Training meetings are held every Monday, generally following SWANA Safety Matters, and logs of the trainings are maintained.

Performance Standard Test

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

HTS provided electronic copies of mass balance spreadsheets which RCI reviewed before scheduling its site visit. Several communications with Mr. Mauck and Ms. Trejo were conducted to review RCI's questions related to the twelve-month mass-balance and monthly entries, as well as to discuss how HTS determines the appropriate information to upload into RCI's web-based reporting system. This process was verified onsite and through review of HTS's Reporting Procedures Guide.

Formulas were reviewed and their validity tested. The recycling and recovery rates information submitted by HTS fell within the Quantitative Materiality threshold (95 percent

or better accuracy) as defined in the EM. RCI concludes that HTS's reported reuse and recycling rates satisfy the Performance Standard Test required per the EM.

Evaluation Statement Overview

RCI's extensive review of data from HTS's Mixed C&D Recycling operation, the findings according to RCI protocols via the evaluation process, and the on-site visit, RCI finds that HTS' 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 Recovery and Recycling rates submitted by HTS as Real Rates as outlined in the EM and 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 are 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	Executive Director Title
Stephen M Bantillo Print Name	August 20, 2021 Date

For Hayward Transfer Station, LLC:

By	Owner Title
Print Name	8/26/21 Date