



RECYCLING CERTIFICATION INSTITUTE



CERTIFIED BLUE RECYCLING, INC.
2075 WILLIAMS ST
SAN LEANDRO, CA 94577

CORR PROTOCOL EVALUATION REPORT

R3 CONSULTING GROUP, INC.
RESOURCES • RESPECT • RESPONSIBILITY



May 6, 2019

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 Certified Blue Recycling, Inc. (Certified Blue) located at 2075 Williams St in San Leandro, California 94577. Certified Blue is a medium volume transfer/processing facility that is owned and operated by Bluewater Environmental Services, Inc.

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 Certified Blue, and the annual recovery and recycling data submitted by Certified Blue was within the quantitative materiality threshold of 95% allowed.

Overview of the Certified Blue Recycling, Inc. Operations

Certified Blue Recycling, Inc. (Certified Blue) is a medium volume transfer/processing facility located at 2075 Williams St in San Leandro, California 94577. The California Code of Regulations, Title 14 (14 CCR), Section 17402 (a)(11) defines a medium volume transfer/processing facility as “a facility that receives equal to or more than 60 cubic yards or 15 tons (whichever is greater) of solid waste per operating day but less than 100 tons of solid waste, for the purpose of storing or handling the waste prior to transferring the waste to another solid waste operation or facility; or a facility that receives any amount of solid waste, up to 100 tons per operating day, for the purpose of processing solid waste prior to transferring the waste to another solid waste operation or facility.” Certified Blue is in the process of applying for a permit to become a large volume transfer/processing facility. Certified Blue facility operations currently include acceptance of construction and demolition wastes, which include mixed C&D, cardboard and paper, carpet (although rare), concrete, dirty/clean fill, drywall/gypsum, green waste (yard/landscape), metals, plastics, wood, screen fines, and alternative daily cover (ADC).

Certified Blue is not open to the general public and only accepts materials from established clients and measures the weight of the material(s) via truck scale upon entrance into the facility yard. The scale is a GSE 560 (capacity rating of 200,000 pounds). The weighmaster license (No. 013909) issued by the Department of Food and Agriculture expires September 1, 2019 and lists sixteen (16) Deputy Weighmaster(s).

Certified Blue is permitted under the County of Alameda Environmental Health Department Permit No. 01-AA-0315. The facility is permitted to operate as a Transfer/Processing Facility six (6) days a week between the hours of 6am – 6pm Monday through Friday and 6am to 12pm on Saturday. Certified Blue is permitted a maximum tonnage of 174 tons per day. All tipping, sorting, and processing must be performed within the 4.9 acres of permitted area.

Mixed C&D and Source Separated

Certified Blue is permitted to accept commingled loads of construction and demolition debris. Certified Blue does not accept material from outside of California. As vehicles enter the facility, they drive up to the scale and wait for the scalehouse attendant to enter the information into the scale datapad. The driver provides the type of material and the scalehouse attendant logs the stated materials. Additionally, the waste classification, county of origin, address of jobsite, time, and truck 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 (floor personnel) Sorters begin separating the material(s). Drivers are directed back to the scale with an empty vehicle to receive a weigh-out ticket before exiting the facility.

Loads containing source separated materials are rare but are directed directly to the bunkers in which they will be placed when they are brought into the facility. Mixed C&D loads are dumped in the center of the site to be separated by Sorters. Loads are negative picked, and the remaining non-recyclable materials are directed to the pile defined as trash/residual. There are 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 material piles as needed as a means for dust control but are available for emergencies (fire) as well.

Cardboard & Plastic Clean cardboard and plastics are collected and stored in separate 40-yard shipping containers until the material is delivered to a third-party vendor.

Concrete Collected and stored in a bunker until material is loaded into a tractor trailer for transfer to destination 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.

Green Waste If commingled with construction material, green waste is pushed into Wood pile for inclusion in grinder.

Metals are collected, sorted, and stored in multiple bunkers until the material is picked up by a third-party vendor.

Mixed C&D Mixed C&D loads are dumped into a reserved area in the middle of the tipping floor to allow for optimal visual inspection. Sorters then separate the material and relocate to their respective bunkers/bins. Any material that is not recyclable is relocated to the Trash/Residual pile.

Scrap Metal Collected and stored in a 30-yard bin and stored until collection by a third-party vendor.

Wood Clean wood is collected and stored in a pile along the tipping floor until the material is processed through the grinder. Floor personnel strip wood of anything that may cause an issue for the grinder. Treated wood is not accepted by the facility, but any treated wood found mixed within loads is separated and stored in a 20-yard bin until transferred to a landfill.

Residuals Residual debris is collected on the tipping floor in piled along the back wall of the facility until delivery via transfer truck to a landfill for disposal.

Certified Blue does not accept hazardous materials however hazardous materials are sometimes found within loads that are deposited onto the tipping floor. When hazardous materials are discovered, they are removed from the pile and relocated to a storage area for collection from a third-party vendor. All discovered hazardous materials are documented and if necessary, reported to the Local Enforcement Agency (LEA).

Development of Evaluation Plan

Certified Blue Recycling, Inc. 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 Antonio Gama (Senior Manager), regarding submittal of documents that would be used in preparation for the Evaluation. Mr. Gama also initiated the certification application process. 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

Certified Blue Recycling, Inc. 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 Filemaker 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 Certified Blue Recycling, Inc.. Antonio Gama (Senior Manager) served as lead contact for the facility throughout the evaluation process and conducted the facility tour during the onsite evaluation. 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 safety training program and materials.

All operations and processes for the facility are handled onsite.

Regulatory Compliance Test

Certified Blue Recycling, Inc. possesses the necessary permits to operate.

The Certified Blue Recycling, Inc. has operated as a resource recovery facility under the current permit since 2014. R3 conducted a review of correspondence between Certified Blue and the Local Enforcement Agency (County of Alameda) between January 2018 and December 2018.

R3 reviewed the inspection/compliance records and while there were a few areas of concern noted, they were being addressed by Certified Blue and were determined to be immaterial to these findings.

Note: Operator stated during R3's onsite evaluation that they were in the process of applying for a new permit to increase the capacity of the facility and become a large volume transfer/processing facility.

Use of Scales

R3 Consulting Group, Inc. concludes that the Certified Blue Recycling, Inc. 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 through combination of data entry including manual input via the scale datapad, a manual ledger, and tracking through Microsoft Excel. The scale is operated only by those employees certified as Deputy Weighmasters.

Certified Blue uses a 60-ton capacity GSE 560 scale system. The scale is calibrated periodically, with the last calibration occurring November 1, 2018 by Quality Scales Unlimited out of Byron, California. The scale is inspected at least annually by the Alameda County Department of Weights and Measures.

All materials that pass over the scale are manually and electronically recorded. Certified Blue implements a quality control measure by eliminating 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. Certified Blue also has a back-up process in place in the event that power to the scalehouse is lost, to ensure that data is still accurately captured and recorded.

Materials In

Information gathered on incoming material contains:

1. Customer/Address Name
2. Origin City/County
3. Scale Weight 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 Weight 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 scale datapad, a manual ledger, and Microsoft Excel for purposes of tracking, reporting, and data collecting.

Supporting Data for Rate Estimates

R3 Consulting Group, Inc. concludes Certified Blue Recycling, Inc. maintains required supporting data as required for recycling and recovery rate estimates.

Certified Blue 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.

Certified Blue was made aware of a minor discrepancy in its records and developed an internal procedure adding a failsafe to combat the issue in the future and ensure that accuracy was maintained.

Data Transcription and Management

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

R3 interviewed Certified Blue's Senior Manager (Antonio Gama) regarding their electronic data collection and report generation practices. Material data from the manual ledger and physical weight tickets are transcribed in Microsoft Excel for reporting purposes. The physical weight tickets are verified and filed by date in sequential order. The reports are also reviewed to ensure accuracy prior to submission.

The generated spreadsheets are created by staff and reviewed by Mr. Gama, comparing the daily totals against the total(s) for the month to ensure accuracy. Tonnage totals are also verified against billing records prior to submittal to RCI. R3 verified Certified Blue'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 Certified Blue.

Individuals Properly Trained for Functions They Perform

Certified Blue Recycling, Inc. employees receive adequate in-house initial and recurring training, including training from outside sources.

R3 reviewed the facility 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 safety policies, as well as safety tests of the site-specific safety measures. Records documenting employee training are maintained indefinitely by the Senior Manager.

Certified Blue conducts bi-weekly training on the topics of health and safety, identification and evaluation of hazards, accident investigation and reporting procedures, drug and alcohol awareness, and the emergency action plan. Each meeting has an accompanying agenda that covers all of the above topics, plus accident/injuries that occurred over the previous quarter and other information that the Senior Manager adds, as warranted.

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

R3 observed Certified Blue employees in proper PPE at all times during the onsite evaluation. Based on the observation of the operation, R3 concludes that Certified Blue 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 Certified Blue prior to scheduling an onsite evaluation. The submitted files were reviewed and areas requiring further clarification were noted. Certified Blue's Safety Manager (Antonio Gama) 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. All materials are weighed upon exiting the facility. R3 concludes that the reported reuse and recycling rates satisfy the Performance Standard Test required per the EM.

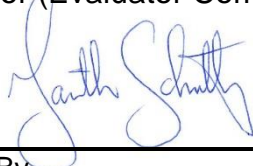
Evaluation Statement Overview

Based on an extensive review of data from the Certified Blue Recycling, Inc.'s Mixed C&D Processing operation, the onsite observation and interview of key staff, R3 finds that the Certified Blue Recycling, Inc. operation meets RCI's eligibility requirements. R3 also found Certified Blue 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 Recovery and Recycling rates submitted by the Certified Blue Recycling, Inc. 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 (Evaluator Company):



By
Garth Schultz

Print Name
Principal

Title
May 28, 2019

Date

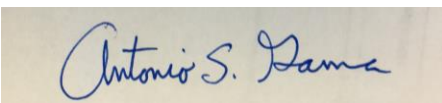
By

Print Name

Title

Date

For (Company/Facility Name)



By
Antonio S. Gama

Print Name

Senior Manager

Title
5/24/19

Date