



# CORR PROTOCOL EVALUATION REPORT

ReSource Waste Services of Lewiston LLC 38 Alfred A Plourde Pkwy Lewiston, ME 04240

**Evaluating Body:** 

Environmental Service Management Group, Inc.

Date Performed: 11.06.23 Evaluator: Michael D. Buono



## **Executive Summary**

This report corresponds to the evaluation of the application for CORR Certification submitted to the Recycling Certification Institute (RCI) by ReSource Waste Services of Lewiston (RWS Lewiston) located at 38 Alfred A Plourde Pkwy in Lewiston, ME 04240.

This evaluation was conducted by Environmental Service Management Group, Inc. (ESMG), 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 Conflict of Interest. RCI Evaluators Manual 2.0 (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 RWS Lewiston facility. 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 was within the quantitative materiality threshold of 95% (less than 5% error) per EM Section 2.2.3.

## Overview of the RWS Lewiston Facility and Operations

RWS Lewiston operates at 38 Alfred A Plourde Pkwy in Lewiston, Maine, an approximately 11.1 acre recycling facility established in 1985. The facility operates under Permit #S-013266-WK-E-R as issued by the Commonwealth of Maine and the Department of Environmental Protection.

As permitted, RWS Lewiston is a full-service recycling operation, accepting construction and demolition (C&D) debris, including treated wood (telephone poles, pilings, railroad ties) and untreated wood, both painted and unpainted (pallets, brush, crates, spools.)

Finished C&D wood product used as biomass fuel in Maine must meet the fuel standards in MEDEP Chapter 418, section 8(F)(3).

RWS Lewiston All materials entering the facility are weighed and recorded at the scale house, including: date, time, weight, hauler, and source location. Incoming and outbound materials establish the monthly recycling percentage. RWS Lewiston operates 5 days per week (Monday through Friday) from 6am to 6pm and Saturdays by appointment only, processing an average of 14,500 tons per month.

# **Materials Sorting and Processing**

When a load of construction and demolition debris arrives at RWS Lewiston, processing of C&D and oversized bulky waste (OBW) begins with the largest bulky materials being separated from the rest of the C&D load by an onsite excavator and set aside. Large appliances, refrigerators, air conditioners, lead-acid batteries, and CRTs/TVs are also removed for recycling before the load is incorporated into the processing pile. Loads

are visually inspected for trash or any other unacceptable waste. The remaining materials are placed and fed into the C&D processing line, where material under 6 inches falls through the vibratory finger screen.

The over 6 inch material discharges onto a picking station (A-Line) which is manned with pickers who remove clean wood, metals, ABC, plastic and cardboard. The remaining materials that are not recyclable are combined with the OBW and sent out for disposal. The material 6 inches and under then goes through a belt magnet before dropping into a deck screener where the material is split up between 0-2", 2-4" and 4-6" pieces. The 2 inch and under material is dropped into the construction fines bunker. The 4-6 inch material is then transferred to a pick station (B-Line) where pickers positively pick metal and ABC. The remaining material is dropped into a bunker. The 2-4 inch material is then transferred to a de-stoner and eddy current to recover additional ABC and metal. The remaining material is then dropped into a fines bunker.

The wood from the picking station is transferred over to the clean wood pile using a loader. This material then gets processed using the stationary wood processing line. The feedstock is fed into the hopper by an excavator equipped with a wood grapple in a volume consistent with the rated capacity of the process line. The "hog operator" controls the feed volume into the hammer mill and oversees proper mill operation. Once processed, chips are moved by conveyors to a magnetic separator where ferrous metal is removed. From the mill, the processed chips are passed onto a screen to remove wood fines. The finished wood chip then falls into the covered stockpile.

Transfer trailers enter through the gate, are scaled in and then proceed to the wood chip storage building. The trailers are loaded by a front-end loader, covered, weighed, and leave the site via the access road.

# **Development of Evaluation Plan**

The RWS Lewiston facility initiated the certification process by registering at <a href="https://www.recyclingcertification.org/registration/">https://www.recyclingcertification.org/registration/</a> 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
- Facility address
- · City/state where the facility is located
- Facility type
- Scale(s) certified (required)
- Permits state/local registration/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

ESMG conducted an interview with Frederic Bruneau (Environmental Compliance Manager) 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. ESMG 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:

- 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.

The RWS Lewiston facility submitted inbound/outbound records from July 2022 to June 2023 and transactions from 2015 to 2023 for ESMG's review to determine accuracy of the mass-balance calculations. The facility provided spreadsheets derived from their software that allowed for calculations and data review as well as determination of random sampling to occur during the site visit including weights, dates, materials, tons, etc.

## Site Visit 11.06.2023

ESMG, Inc., a certified RCI evaluating body, performed an on-site evaluation of the RWS Lewiston facility. Frederic Bruneau, Environmental Compliance Manager, served as lead contact for the facility throughout the evaluation process. Frederic was responsible for submitting the initial Application for Certification and responding to subsequent inquiries as well as conducting a full walk-through of the facility, examining where materials enter, where they are measured, deposited, processed/sorted, and eventually leave the facility.

The review included follow-up questions from the initial data review. 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 the RWS Lewiston facility data, were conducted. ESMG also reviewed the facility training materials 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.

## **Regulatory Compliance Test**

The RWS Lewiston facility possesses the necessary permits to operate.

The RWS Lewiston facility has operated as a resource recovery facility since 1985. It operates under Permit #S-013266-WK-E-R issued by the Commonwealth of Maine. There have been no communications from regulatory agencies in the past twelve months regarding noncompliance 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 the RWS Lewiston facility recycling rates.

## **Use of Scales**

ESMG concludes that this facility satisfies the requirements for use of scales.

The scale house is equipped with one 60 ton capacity truck scale. All inbound and outbound transactions are tracked through the RWS Lewiston facility's scale operating system and managed by trained weight masters as verified by ESMG, Inc.

The truck scale weighs all inbound and outbound materials. The facility complies with requirements established by the Office of Weights and Measures of Maine and is required to maintain scales. They are maintained and calibrated annually by Maine Scale LLC in Auburn, Maine.

All inbound and outbound materials cross the scale and measurement values are both manually and electronically recorded. This method provides verification at the end of each day for accurate reporting.

#### Materials In

Information gathered on incoming material consists of:

- 1. Customer name
- 2. County of origin
- 3. Scale ticket number
- 4. Description of vehicle
- 5. Scale attendant
- 6. Inbound material type
- 7. Date in
- 8. Gross Weight

## Materials Out

Information collected on outgoing trucks consists of:

- 1. Time out
- 2. Tare Weight
- 3. Tons

For outbound materials, much of the same information is compiled but listed here below for transparency:

- 1. Code assigned to each destination
- 2. Truck information
- 3. Commodity
- 4. Customer name
- 5. Date and time out
- 6. Ticket number
- 7. Gross weight
- 8. Tare weight
- 9. Total tons

All Inbound and Outbound data is entered into RWS Lewiston' software system for purposes of reporting and data collection.

## **Outbound Materials and Markets**

RWS Lewiston has provided ESMG with a list of materials/end markets.

**ABC** is collected, sorted, and sent to a local facility.

**Cardboard** is separated from other materials, baled, and sold as a commodity.

**Metal** is collected and sent to a local scrap metal facility.

**Plastic** is collected, sorted, and sent to established end markets.

**Wood** is collected, processed, and used as biomass fuel in the state of Maine.

# **Supporting Data for Rate Estimates**

ESMG, Inc. concludes RWS Lewiston maintains required supporting data as required for recycling and recovery rate estimates.

RWS Lewiston provided twelve months of reports for inspection, ranging from July 2022 to June 2023. ESMG randomly chose records for sampling to cross-check entries in the electronic reports to ensure accuracy. A sample of outbound loads was selected to further confirm the disposition of materials recorded as having left the facility.

# **Data Transcription and Management**

Sufficient QC exists for creation of reuse and recycling rate tables from RWS Lewiston's software.

ESMG, Inc. interviewed Frederic Bruneau regarding their electronic data collection and the generation of all reports as well as supporting mass balance spreadsheets. Material data is manually entered into the system for accounting purposes. These reports are periodically reviewed to verify accuracy.

The spreadsheets are generated and reviewed before submittal (uploading) to the evaluator. Based on the critical need for accurate monthly spreadsheets for internal and customer accounting, RWS Lewiston's verified procedure, observed competencies, as well as ongoing training of the individuals involved in the data entry, and final crosscheck, ESMG concludes that sufficient QC exists for data transcription and management per the EM 4.7.

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

RWS Lewiston employees receive adequate in-house initial orientation as well as recurring training, including training from outside sources when necessary.

ESMG, Inc. reviewed the training schedules and guidelines as well as conducted interviews with key employees during the site visit. RWS Lewiston conducts training for employees involved in safety, vehicle operation, load-checking, sorting, and inspection.

Initial or new hire training is performed for all incoming employees. Additionally, annual safety training is done, focusing on proper lifting/lowering techniques, slip/fall prevention, defensive driving training as well as space and visibility training.

Safety meetings focus on current commodity trends, and possible hazards. Daily observations performed by operations staff and safety team ensure training is being applied. Follow up training is performed for all warnings and violations given.

RWS Lewiston' safety manual and education follows all OSHA regulations. All training certifications, logs, and safety records are stored on-site for immediate review.

Training records identify all key information on employees' training including documentation by the trainer of successful completion. ESMG, Inc. observed these employees in the scale house and designated tipping and sorting areas. Employees were observed utilizing proper safety equipment and clear signage was posted.

Based on the observations of staff, the work areas, and the initial and ongoing training of RWS Lewiston employees, ESMG concludes that the facility provides employees with the requisite training.

With regard to the ongoing COVID-19 public health emergency, ESMG found RWS Lewiston to be in accordance with guidelines established by OSHA and the Commonwealth of Maine.

The following safety protocols are strictly adhered to at the facility:

- Every machine is cleaned by operator before and after every shift.
- Sanitizer stations have been placed throughout the facility.
- Masks are required at all times for anyone unvaccinated.

## **Performance Standard Test**

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

ESMG requested electronic copies of mass balance spreadsheets for RWS Lewiston before scheduling a site visit. Formulas were reviewed by ESMG and their validity tested. Select transactions were identified for further review during the site visit. The recycling and recovery rates information submitted by RWS Lewiston fell within the 5% tolerance threshold defined per the EM. ESMG concludes that RWS Lewiston's reported reuse and recycling rates satisfy the Performance Standard Test required per the EM.

## **Evaluation Statement Overview**

ESMG finds that the ReSource Waste Services of Lewiston facility's operation meets RCI's eligibility requirements, based on the following factors:

- Review of the data from the RWS Lewiston facility operations.
- Findings according to RCI protocols via the evaluation process.
- · On-site visit and interviews with staff.

It is in compliance with all measurement and record-keeping requirements and has no existing material or significant immaterial nonconformance or misstatements in its reported data. ESMG hereby recommends that the recovery and recycling rates submitted by the ReSource Waste Services of Lewiston facility be certified 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):	
Monthy	Certified RCI Evaluator
Ву	Title
Michael D. Buono	November 17, 2023
Print Name	Date
For (Company/Facility Name)	
FBM	Environmental Compliance Manager
Ву	Title
Frederic Bruneau	December 26, 2023
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