



RECYCLING CERTIFICATION INSTITUTE



WEST DUPAGE RECYCLING & TRANSFER, INC.

CORR PROTOCOL EVALUATION REPORT

October 26, 2015
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 West DuPage Recycling & Transfer, Inc. (WDRT) on behalf of its Mixed Construction & Demolition (C&D) recycling operation located at 2351 Powis Road, West Chicago, IL, 60185. WDRT is one of several K. Hoving Companies businesses occupying the same parcel, which include Hoving Clean Sweep, LLC. (street sweeping), Hoving Pit Stop, Inc. (portable restrooms), and K Hoving Recycling and Disposal, Inc. (Roll-Off Dumpsters and Commercial Hauling services).

This Evaluation was conducted by RCI and represents an independent review of WDRT 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 WDRT 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 WDRT was within the quantitative materiality threshold of 95% (less than 5% error) per EM Section 2.2.3.

Overview of West DuPage Recycling and Transfer Facility and Operations

West DuPage Recycling & Transfer, Inc. currently operates the WDRT Mixed C&D recycling facility located at 2351 Powis Road, West Chicago, IL, 60185 and owned by Ken Hoving and K. J. Loerop. The WDRT facility has been operating since 1991 as permitted by the Illinois Environmental Protection Agency (IEPA) Bureau of Land Interest ID 0438065004. A Conditional Use Permit was issued by the State of Illinois, County of DuPage via an ordinance (Zoning Permit 3954-90) adopted May 14, 1991. The facility is permitted to accept up to 600 tons per day of separated and Mixed C&D materials. Per Section 415 ILCS 5/22.38 of the Illinois Environmental Protection Act, WDRT operation must adhere to a 75% minimum recycling requirement. The facility is open Monday through Friday from 5:00 am to 7:00 pm and on Saturday from 6:00 am to 1:00 pm where it accepts loads from its own hauling operations as well as third-party haulers.

The facility is set up with one 50' certified scale that every truck enters after passing through a staging area from the entrance off Powis Road. When the truck arrives on the scale, the information is recorded in PC Scale, the company's data management software. The scale operator inspects the load contents via camera observation and the driver is directed by a signal to either head to the north end or south end of the

facility, depending on load and traffic flow. Yard staff then direct the truck to the exact spot where it should dump, and the load is dumped on the ground and inspected once again for garbage and other forms of contamination. The truck then exits to Powis Road, turns south, and re-enters the facility following a one-way traffic pattern to enter the scale again to capture the empty weight, where the transaction is completed by PC Scale software.

Daily Operations Flow

North: Loads directed to the north end of the facility contain a majority of single commodity materials such as shingles, wood and aggregate. These loads are hand sorted and the waste streams are then segregated into specific bunker areas with a wheel loader. Starting at 3:00 am each day, wood and road base materials are ground or shredded to reduce space needed for storage and to prepare them for outbound transit.

South: The Sparta Industries sort line is located at the south end of the facility. Loads that contain a broader mix of debris are dumped on the ground outside of a covered three-sided structure. From there, a wheel loader and excavator move material into a hopper system where the material passes through two screeners. During this process, screen fines and 3" to 8" materials are separated, along with a magnet system to capture metals. Materials that are over 8" in size continue up a conveyor system to an elevated structure for manual sorting. During this stage of the process, laborers hand pick materials and drop the materials through hoppers where they fall to bunker areas for storage.

Contracted semi-trucks & trailers enter the facility several times each day and back into loading pits where wheel loaders load the segregated materials for transport to a final destination. Semis are loaded in one of two pits which are located on the north and south side of the facility. The empty truck weight and full weight are captured using the same process to manage data.

Description of Ticketing Process

Each time a truck comes through the facility, a loaded weight and empty weight are recorded which makes one transaction in PC Scale, WDRT's data management software. Each transaction generates a paper ticket for use in-house or for an external customer when inbound or outbound. All pertinent information is stored in the PC Scale software system which is used to generate reports of all materials--Mixed C & D waste inbound and segregated materials headed outbound.

Mixed C&D and Single Material

Aggregates (Concrete, bricks, and ceramics) are sometimes received as clean single commodity loads and directed to the north end of the facility where they are further hand sorted and segregated into bunker areas with a wheel loader. Aggregates manually sorted on the south end of the facility are combined with those in bunkers on the north end of the facility. Road base materials are processed and prepared for outbound transit.

Cardboard (OCC) is sometimes received as a clean single commodity material, but is primarily pulled from the sorting line and dropped in the appropriate bunker. The cardboard is loaded in semis and hauled to a recycler.

Carpet Padding & Foam is received occasionally and makes up an incidental amount of materials handled by WDRT (less than .1%). When there is enough material for shipping, it is sent to a recycler.

Gypsum Drywall is directed to the south area where it is manually sorted and placed in a bunker until there is enough material to transport to drywall recycler.

Metals (ferrous & non-ferrous) are manually sorted from the sort line where the various types—including wire—are stored in containers and bunkers before being transported for recycling.

Plastics WDRT receives incidental amounts of plastics (less than .2% of the facility's outbound) that are sorted manually on the sort line, dropped in a bunker, and then sent to other recyclers when there is enough material for a load.

Roofing material is generally received in single commodity loads and directed to the north end of the facility where it is further hand sorted and then segregated into bunker areas with a wheel loader. Materials are shredded daily with a Hammel shredder and are prepared for outbound transit.

Screen Fines are collected at the end of the sorting line and prepared for transfer to a facility where they are beneficially used for solidification of biosolids.

Wood is generally received as single commodity loads and directed to the north end of the facility where it is hand-sorted prior to being moved to a bunker with a wheel loader. Wood is also manually sorted from the sorting line and delivered to the wood piles at the north end. The wood is ground daily with the Vermeer grinder and sent to markets for use as mulch, fuel, and reuse as an approved road base.

Residuals from the sorting activities at the WDRT facility are primarily the non-recoverable materials from sorting and are sent to landfill.

Development of Evaluation Plan

WDRT 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 – 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

RCI conducted an interview with Mr. Ken Hoving, WDRT's President, and Mr. Greg Walstra, CFO, regarding submittal of documents that would be used in preparation for the Evaluation. Key elements of this information can be found in the CORR Protocol 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:

- 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.

WDRT submitted twelve prior months' data for RCI's review to determine accuracy of the mass-balance calculations. WDRT 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 on which to follow-up during the site visit.

SITE VISIT

On September 30, 2015, RCI performed an on-site evaluation of the WDRT Mixed C&D line operations. Mr. Ken Hoving, Mr. Greg Walstra, and Mr. K.J Loerop (Vice President) conducted the tour of the facility. Mr. Walstra served as WDRT's lead contact throughout the Evaluation process and was responsible for submitting the initial application 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 were conducted with staff associated with the key areas of the operations, in particular, those staff that have access authority and responsibility for maintaining, reviewing, and

overall integrity of WDRT's data. 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.

The facility and work site was observed to be clean, well-maintained, and maintenance logs are kept. Adequate signage was observed for safety, hazards, material identification, as well as indicating directions for traffic and where materials should be placed. Personnel were observed to be wearing appropriate personal safety equipment. A street sweeper was in use for onsite dust control.

Special Note to This Section:

WDRT is in the process of building a new facility located at 1655 Powis Road in West Chicago, IL, 0.8 miles south of the current location. The new location will provide substantially more space for operations; however, the processes will be similar to the existing facility in terms of work and traffic flow. The permit for the new facility increases the capacity to accept 1,250 tons per day of mixed C & D material.

The State of Illinois EPA issued to WDRT a permit 2015-124DE on June 18, 2015 allowing construction of the facility at 1655 Powis Road. The City of West Chicago, on May 18, 2015, adopted Ordinance No. 15-O-0018 for a Code Amendment to Appendix A Article 11.2 of West Chicago Zoning Code approving a number of Special Use Permits including that for a Construction and Demolition Debris Recycling Facility.

The Sparta Industries sort line from the current location will be moved to the new location tentatively scheduled to be operational January 2016. RCI has created a photo journal of the sorting line and equipment in its current configuration as part of this Evaluation. Mr. Hoving provided a tour of the new facility under construction at 1655 Powis Road and a photo journal of that facility was created as well. RCI will visit the new facility after it is operational to confirm sort line installation, operation, and material flows. This change does not immediately constitute a Conditional Certification per the EM or CORR Protocol 1.9, but RCI will monitor as necessary.

Regulatory Compliance Test

West DuPage Recycling and Transfer possesses the necessary permits to operate.

WDRT operates under permits issued by the Illinois Environmental Protection Agency (IEPA) Bureau of Land Interest (ID 0438065004) and a Conditional Use Permit issued by State of Illinois, County of DuPage via an ordinance (Zoning Permit 3954-90); both approved in 1991.

There has been no substantiated 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 WDRT's recovery and recycling rates.

Use of Scales

RCI concludes that the West DuPage Recycling and Transfer facility satisfies the requirements for use of scales.

WDRT utilizes one 50' scale for weighing inbound and outbound loads that is electronically connected to the scale house and main office. All inbound and outbound transactions are tracked through WDRT's scale operating system (PC Scale) and managed by certified weighmasters as verified by RCI.

Materials In

All incoming loads are assessed by the Scale House Operator to determine acceptability and categorize the material. After weighing, the driver is directed to the appropriate location in the facility where the yard staff provide more specific direction to the driver on where to empty the vehicle, observing the load as it is deposited. The empty vehicle proceeds out the exit at the north end of the facility and repeats the weighing process to create a complete transaction in PC Scale.

Materials Out

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

All Inbound and Outbound data is automatically entered into WDRT's electronic data management system (EMS) which is connected to the offices onsite. WDRT's scales are calibrated at least once per year (the CORR minimum, but quarterly is recommended) by a scale contractor licensed by the State of Illinois. After calibration or performing any work on the scale, the Illinois Department of Agriculture Bureau of Weights and Measures is notified and comes out to perform an inspection. RCI reviewed a sample of scale inspection, service, and calibration records and confirmed the scale had been Certified within the past twelve months. RCI also reviewed a sample of weight tags in the records storage office to verify accuracy of the EMS as well as the process for any subsequent manual adjustments.

Supporting Data for Rate Estimates

RCI concludes West DuPage Recycling and Transfer maintains required supporting data as required by the EM for recycling and recovery rate estimates.

WDRT uses PC Scale for its EMS system and retains electronic receipts for incoming and outgoing materials/markets and produces hardcopy receipts for customers and on an as-needed basis. WDRT's lead Certified Weighmaster (Mr. Dave Meyer) provided a demonstration of this capability during the site visit. Mr. Meyer also demonstrated a process he implemented to check the weights of loads sent from WDRT and compare them to weights reported by recipients of WDRT's materials. WDRT 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. A sampling of customers was selected to further confirm the disposition of materials recorded as having left WDRT.

Data Transcription and Management

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

RCI interviewed WDRT's CFO (Mr. Walstra) regarding the PC Scale 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. Mr. Walstra is responsible for developing and maintaining numerous programs at WDRT, including financial controls, record-keeping and reporting. RCI observed a high level of accuracy and consistency in the transmittal of reports from WDRT into RCI's web reports.

Individuals Properly Trained for Functions They Perform

West DuPage Recycling and Transfer employees receive adequate in-house initial and recurring training, including training from outside sources.

WDRT regularly conducts/receives training on sort line and tip floor safety, operator training, Lock Out - Tag Out, various equipment, tools, electrical, relevant laws, and administers multilingual quizzes. RCI reviewed logs of the training and modules/materials as well as conducted interviews with key employees during the site visit. Adequate signage was observed for safety, hazards, and material identification, and all personnel were observed to be utilizing appropriate personal safety equipment. New and junior sorting and yard staff wear yellow bump caps to designate them as such and are provided with orange bump caps after gaining more experience. Stickers are added to bump caps to signify additional experience and completion of specific training modules. This system of bump cap designation allows lead staff to provide guidance to new staff when appropriate as well as ensure only those who have been trained on certain operations are the ones actually performing those operations, thereby providing another measure of performance and safety.

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

Performance Standard Test

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

WDRT provided electronic copies of mass balance spreadsheets and RCI reviewed these before scheduling its site visit, noting areas requiring clarification. Several phone meetings with WDRT's CFO (Walstra) and President (Hoving) were conducted to review

RCI's questions related to the twelve-month mass-balance and monthly entries, as well as to discuss how WDRT would upload the information into RCI's web-based reporting system.

Formulas were reviewed and their validity tested. RCI reviewed select transactions during the site visit. During the site visit, WDRT's lead Certified Weighmaster demonstrated WDRT's use of PC Scale to retrieve information that would be used to generate reports. The recycling and recovery rates information submitted by WDRT fell within the Quantitative Materiality threshold (95 percent or better accuracy) as defined in the EM. RCI concludes that WDRT'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 WDRT's 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 WDRT's 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 WDRT 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 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:



Executive Director

By

Title

Stephen M Bantillo

October 26, 2015

Print Name

Date

For West DuPage Recycling and Transfer, Inc.

Owner/President

By

Title

Ken Hoving

October 26, 2015

Print Name

Date