



## AVA Recycling's Environmental Policy Statement: A TechWaste Solutions Company

AVA Recycling, an IL EPA Registered e-Waste collector is committed to maintaining a zero electronics waste landfill policy. AVA carefully reviews its practices and those of our partner vendors to assure compliance with all current regulations for proper disposition and transport of end of

cycle, obsolete electronics.

AVA Recycling strives to meet industry standards including R2 Responsible Recycling, E Stewards, RIOS and other best practices in its collections and end market reclamation of electronic material and equipment.

AVA continuously monitors and updates its practices regarding new legislations and 'state of the art' processes as apply to e-waste disposal, data destruction and hazardous waste management.

AVA supports initiatives for ReUse, Reduce & Reclaim that contribute to healthy and sustainable communities that are both economically and environmentally sound.

### **AVA Environmental Health & Safety Guidance for Employees & Partners**

#### *Environmental practices*

R2 defines focus materials, or materials that can pose environmental concern, and outlines how these materials should be managed to ensure environmental and worker safety.

Awareness of the environmental "impacts" associated with our work. This pertains to both the materials side as well as processes side.

Requires downstream due diligence on all vendors handling focus materials to ensure materials are handled properly throughout the chain of custody.

Prohibits the export of equipment and components containing focus materials to developing countries unless the transaction is legal under both the export and import countries' laws and the receiving facility is adequate to the recycling processes.

All R2 certified electronics recyclers maintain necessary permits, licenses and insurance as required by state and federal regulations. R2 requires that all recyclers send materials to licensed and permitted facilities.

### **AVA Recycling: Environmental, Health & Safety Management System Summary**

1.) Requires employees adapt its facility's plan and processes to meet R2 Responsible Recycling 2013 standard to the extent of the scope of activities for storage, testing, disassembly of electronic equipment collected.

2.) Requires that a designated safety officer be assigned to oversee safety practices emergency preparedness in accordance with R2 2013 standard as applies to activities in and around the premises of AVA's facility (s).

This encompasses at a minimum:

a. oversight of fire & building code requirements and egress clearances as legally required.

b. maintenance of hazardous or focus materials inventory including oversight of proper storage (containment) and labeling (identification) of these materials and any transport considerations for these materials.

c. maintenance of a first aid station adequately supplied with basic emergency supplies.

d. maintain PPE's (personal protective equipment) adequate to the scope the testing or demanufacturing that might be expected to take place at the facility(s).

nitril gloves to protect hands from sharp materials when disassembling machines

eye gear when disassembly requires any high power or pneumatic tools  
back braceing vests for lifting and carrying equipment and heavy boxes or objects  
proper boots preferably steel toe to protect from foot injuries  
dust masks when disassembling or working in warehouse for extended periods with liittle ventilation

e. maintain plans and equipment sufficient to respond to hazardous events  
as might potentially occur at the facility(s) and assure that employees are  
trained to the extent of their capabilities to operate such equipment.

3.) AVA 's top management will on an ongoing basis evaluate and adjust its  
downstream vendor preferences based on their compliance with R2, RIOS, eStewards, and other standards and accepted practices as pertains to focus materials and related hierarchy of management  
strategies to assure that regulatory compliances are being met as regards specific materials. These strategies fall into the basic categories of repair and re-use vs. destruction (disassembly & scrapping)  
only.

4.) AVA's top management will manage data handling based on the reuse  
DoD wiping process vs. destruction only i.e. hard drive shredding.  
AVA abides by the protocols as developed by the NIST (National Institute  
of Standards and Technology) Guidelines for Media Sanitization -  
Special Publication 800-88 and NIAD standards for data destruction  
specifications.

5.) AVA uses the R2 Plan+Do+Check+Act strategy to review its procedures  
and processes on a semiannual basis or as critical incidents may warrant.  
AVA will continue to work with its R2 vendors to upgrade practices when  
notification of improved operational techniques that have bearing on AVA's  
strategic and environmental interests are discovered. AVA hence seeks to  
continuously improve its standards of operation and environmental, health &  
safety measures.