

Evidentiary Report of e-Stewards® Critical Non-Conformity FINAL

eGreen IT Solutions

February 20, 2023

Case Number: 11-1-22-01

Observation Locations/Sources:

- e-Stewards Performance Verification (PV) program, which included:
 - GPS trackers installed in two hazardous e-waste devices, both delivered to eGreen IT Solutions in Phoenix, AZ, and
 - An unscheduled virtual PV audit and resulting internal report
- Global satellite data for two GPS trackers
- 2022 Downstream Disposition Chart from eGreen IT Solutions
- Multiple documents and emails from Karin Harris of eGreen IT Solutions in response to draft Evidentiary Report

Dates of Observations: June 7, 2021 – February 13, 2023

Appendices:

APPENDIX 1: Data (Dates, Locations, and Satellite Photos) Pertaining to Tracker # PV062343 to the Philippines

APPENDIX 2: Data (Dates, Locations, and Satellite Photos) Pertaining to Tracker #PV081145 to Malaysia

APPENDIX 3: eGreen IT Solution's Downstream Disposition Chart (non-essential information deleted)

APPENDIX 4: eGreen's Desk Audit Checklist for Olgin Efune Recycling Company (OERC), dated 3/20/2021

APPENDIX 5: Excerpts from eGreen's Downstream Provider Questionnaire for OERC, dated 7/4/22

APPENDIX 6: Two of eGreen's Outbound Reports indicating printers transferred to OERC

APPENDIX 7: Excerpt of email from eGreen to OERC, referencing Malaysia, dated 10/10/22

			<ul style="list-style-type: none"> • Appendix 5: Excerpts from eGreen’s Downstream Provider Questionnaire for OERC, dated 7/4/22. Sixteen months after beginning their IDP approval process, eGreen still had not approved OERC, but could see that printers were being “shipped as is” to Malaysia; • Appendix 6: eGreen’s Outbound Reports indicate that 1982 pounds of printers were shipped directly to OERC as early as 6/10/21 and at least through 12/13/21, when they could not be approved due to problems with their downstream; • Appendix 7: Excerpt of email from eGreen to OERC, dated 10/10/22, in which Karin Harris implies it is acceptable for OERC to send eGreen’s MOCs to Malaysia. While already shipping printers to OERC without IDP approval, this email from Karin Harris says: <i>“Here are the items we send [ostensibly elsewhere; the long list includes printers]. What needs to be understood is the process of processing the items. As the [downstream] chart stands right now, it indicates that OERC doesn’t do anything with any electronics and sends them all to Majestic Corporation [in Malaysia] for processing. If this a true, then we would need to know what Majestic does with the following materials:</i> <ul style="list-style-type: none"> ○ Boards 	
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			<ul style="list-style-type: none"> ○ <i>Spent Lamps or Lamps from LCD Monitors</i> ○ <i>Plastics from the items</i> ○ <i>Batteries (button batteries - lithium ion)”</i> <p>In accordance with 6.1.3.1 of the Standard, Materials of Concern from e-Stewards facilities/control are not allowed to be exported to non-OECD (developing) countries either directly or via downstream vendors.</p> <p>The fact that two separate tracker-enabled printers went from eGreen IT Solutions to one or more non-Basel Annex VII countries over at least a six-month period indicates a pattern of behavior and willfulness, in violation of 1.3.2.1 of the CNC Policy. And there is a high likelihood of at least two shipments of printers (sent to OERC around the same time as the two trackers) followed OERC’s export pathways.</p>	
2	8.8.1 Downstream Accountability	<p>The Organization shall establish, implement, and maintain the processes necessary to ensure all MOCs are managed in conformity with this section of the Standard.</p> <p>8.8.1 Downstream Disposition Chart</p> <p>The Organization shall create and keep current a downstream disposition chart documenting the Recycling Chain for all MOCs that move through the Organization’s Control, noting any alternative uses or processes.</p>	<p>eGreen’s Downstream Disposition Chart [excerpted in Appendix 3] does not indicate that any printers are being transferred to OERC or exported by them out of the US, e.g., to Malaysia or the Philippines. Meanwhile, eGreen’s Outbound Reports (see Appendix 6) indicate at least two shipments of printers (1982 lbs.) went to OERC over six months.</p> <p>Instead, OERC is only listed in eGreen’s chart as the end of the recycling chain for eGreen’s</p>	<p>8.8.1 Likely a MAJOR non-conformity alone, but evidently part of a willful pattern, therefore contributing to the CRITICAL NON-CONFORMITY 1.3.2.1 a) related to export and e) related to downstream due diligence</p>

			ferrous and non-ferrous materials.	
3	<p>8.8.2 Downstream Accountability</p> <p>1.3.2.1 Critical Non-Conformity Policy</p>	<p>8.8.2 Downstream Due Diligence</p> <p>The Organization shall ensure that its MOCs are managed only by approved Downstream Providers and Intermediaries throughout the Recycling Chain. Documentation supporting DSP approval shall be retained, including the following, as applicable:</p> <p>8.8.2.1 Processing Capability Evaluations 8.8.2.2 Desk Audits 8.8.2.3 Onsite Audits of Immediate Downstream 8.8.2.4 Agreements and Control Systems a), b) and c)... 8.8.2.6 Records of Transfer b)</p> <p>Subsection 1.3.2.1 e) of the CNC Policy includes the following as cause for a finding of a CNC: "...a pattern of repeat major nonconformities, such as repeated failure to perform adequate downstream accountability requirements."</p>	<p>eGreen provided BAN with Outbound Reports that indicate at least 2 shipments including printers went from eGreen to OERC over at least 6 months (see Appendix 6). However, OERC was never approved by eGreen as an Immediate Downstream Provider from March 2021, when eGreen first began the approval process, up until they were confronted with the CNC draft Evidentiary Report in November 2022, twenty one months later. Despite repeated requests, BAN was not provided with evidence that eGreen ever completed requirements in sections 8.8.2.1 through 8.8.2.6 for OERC.</p> <p>Despite requirements to approve IDPs for MOCs <u>prior</u> to sending first shipments, as well as auditing them on an ongoing basis, on 12/5/22 Karin Harris of eGreen said in an email to BAN, <i>"No we would not have the documents required by the standard for an approved downstream vendor because I did not "Approve" them for focus materials."</i> This comment comes after she had been shipping printers to OERC at least since 6/10/21 (see Appendix 6).</p> <p>In addition, both eGreen's (confidential) certification body audit report and BAN's Performance Verification audit report identified and communicated to eGreen its nonconformities with downstream due diligence</p>	<p>CNC 1.3.2.1 e. CRITICAL NON-CONFORMITY pertaining to repeated violations of 8.8.2 requirements</p>

			<p>requirements in 2022 and 2021 respectively.</p> <p>Evidence of repeated failures to perform adequate downstream due diligence have resulted in a finding of a 1.3.2.1 e) critical non-conformity from the CNC Policy.</p>	
4	8.9 Data Security	The Data Security provisions for those Organizations that are not yet NAID AAA Certified are found in Appendix D.	<p>Most printers built in the last 30 years or so have built-in memory. If printers from eGreen contained data, were unsanitized, and were shipped to any entity other than an approved Immediate Downstream Provider (IDP) that completed the data requirements found in the Standard, this constitutes a violation of the Standard. OERC claims in their eGreen Downstream Provider Questionnaire (see Appendix 5) that they shipped printers “as is” to Port Klang West in Malaysia.</p> <p>eGreen provided no evidence that it a) determined whether or not printers sent to OERC contained data, b) sanitized data on the printers, or c) ensured that their IDP sanitized data.</p>	8.9 Likely MAJOR non-Conformity

Case Description

BACKGROUND: After initially launching the e-Stewards certification program, the Basel Action Network (BAN) set up additional layers of oversight for the e-Stewards Certification program. The first was the Critical Non-Conformity (CNC) Policy, which added a layer of requirements above and beyond what accredited certification bodies and their auditors can do. In addition, all e-Stewards recyclers and refurbishers are subject to the Performance Verification (PV) program. All e-Stewards processors have been informed of and participate in the PV program. The PV program now includes not only unannounced on-site (or virtual during COVID) inspections, but also GPS monitoring program. This latter aspect of the PV program involves the embedding of GPS trackers into hazardous e-waste devices, such as printers containing circuit boards, which are then placed into the waste stream and

tracked around the world, via satellite, with BAN's EarthEye technology. For more information about the PV program, go to <https://e-stewards.org/learn-more/for-recyclers/overview/performance-verification-program/>. For more information about the EarthEye program, go to <https://www.eartheye.org/>.

As part of its ongoing e-Stewards Performance Verification program, on June 7th, 2021, a BAN operative deployed an HP printer (Serial Number: CN99HH34B4) enabled with a GPS tracker (PV062343) to eGreen IT Solutions, LLC located at 11034 N 23rd Dr #107, Phoenix, AZ 85029. The device sent a signal from eGreen IT Solutions, LLC until June 10th, 2021, when it then moved to Olgin Efune Recycling Company (OERC) located at 2449 W Madison St, Phoenix and stayed there from June 10th - Aug. 3rd. It then moved to IQA Metal located at 13825 Norton Ave, Chino, CA 91710 and stayed there from Aug. 4th - Aug 19th. It was then exported to TXD Electronics Corporation located at Subic Bay Freeport Zone, Zambales, Philippines. The first signal sent from TXD Electronics Corporation was on Nov. 19th and the last signal sent from that location was on November 22nd, 2021. GPS coordinates: 14.822364, 120.303901. See Appendix 1 for detailed data and Google satellite photographs of each downstream location pertaining to Tracker #1.

A BAN operative then deployed a second Lexmark printer on Dec. 9th, 2021 (Serial Number: 4448249901TWR) enabled with a GPS tracker (PV081145) to eGreen IT Solutions, LLC located at 11034 N 23rd Dr #107, Phoenix, AZ 85029. The device sent a signal from eGreen IT Solutions, LLC until Dec. 13th, 2021, where it then moved to Olgin Efune Recycling Company located at 2449 W Madison St, Phoenix and stayed there from Dec. 13th, 2021 - Jan. 13th, 2022. It then moved to IQA Metal located at 13825 Norton Ave, Chino, CA 91710 and stayed there from Jan. 13th - March 8th. It was then exported to Malaysia and signaled from what looks to be an e-waste processor located at 7 Jalan Bukit Kemuning, Shah Alam, Selangor, Malaysia (GPS Coordinates: 3.014519, 101.519811) from May 18th - May 21st before moving to a greenspace located at 22 Jalan Damar 9, Pelabuhan Klang, Selangor, Malaysia, where it is was still signaling as of May 2022 (GPS coordinates: 2.982474, 101.432718). See Appendix 2 for detailed data and Google satellite photographs of each downstream location pertaining to Tracker #2.

NOTE: Tracking devices installed inside printers do not survive mechanical shredding intact. Most are not still functioning after manual disassembly, as there are multiple components to a tracker (including batteries) that typically get separated. But in this case, two intact trackers made their way at two different times from eGreen to Malaysia and to the Philippines, respectively, through the same downstream vendors in the US, greatly increasing the likelihood that the two printers were intact when they were exported. Indeed, eGreen's downstream vendor for some printers, OERC, informed eGreen that printers were "shipped as is" to Malaysia (see Appendix 5).

Section 6.1.3.1 of the Standard referenced in Section 8.7 makes it clear that exports of Materials of Concern (MOC) waste to non-Annex VII Basel (developing) countries is forbidden under the e-Stewards Standard and the responsibility for ensuring this is borne by the e-Stewards Certified processor -- in this case eGreen IT Solutions.

Once two trackers in MOCs confirmed possible violations of the e-Stewards CNC Policy, and as required in that policy, eGreen IT Solutions was presented with the above evidence collected by BAN, in this case the destinations of two printers with trackers, in a DRAFT Evidentiary Report. eGreen was given multiple opportunities to provide countering evidence and explanations. During this process, however, not only was there a lack of evidence of adequate downstream due diligence and

transboundary movement controls as required by the e-Stewards Standard, but new evidence of wide-spread violations was provided by eGreen IT Solutions.

Specifically, beyond the two trackers, additional evidence or the lack thereof included:

1. eGreen explained that they began a process to approve Olgin Efune Recycling Company (OERC) to accept eGreen's 'e-scrap' (MOCs) as early as March 2021, but eGreen never completed their approval of OERC even up to 21 months later when eGreen was confronted with the Draft CNC Evidentiary Report in early November 2022. And yet, at some point eGreen began shipping at least printers to OERC (see two Outbound Reports in Appendix 6, dated in June and December 2021). And on 12/5/22, Karin Harris of eGreen said in an email to BAN, *"No, we would not have the documents required by the standard for an approved downstream vendor because I did not 'Approve' them for focus materials."*
2. Karin Harris did not approve OERC in March 2021 due to "waiting for further downstream information for final approval" (see Appendix 4), therefore eGreen was apparently aware of downstream problems prior to the June 2021 shipment of 1126 lbs. and the December 2021 shipment of 856 lbs. of printers to OERC (see Appendix 6).
3. Still trying to approve OERC for MOCs in July 2022, eGreen received OERC's Downstream Provider Questionnaire dated 7/4/22 (see Appendix 5) indicating that OERC shipped printers "as is" to the Majestic Corporation in Port Klang West, Malaysia, underscoring eGreen's concerns from 17 months earlier.
4. Regarding Malaysia, eGreen also provided an email chain between Karin Harris of eGreen and Brad Efune of OERC (see Appendix 7). In a 10/10/22 email to Mr. Efune, Ms. Harris 1) appears to acknowledge (twenty months after starting her approval process) that OERC does no processing of any electronics and instead sends them to a company located in Malaysia, and 2) appears to be comfortable with her MOCs being processed in Malaysia (in violation of the Standard), as long as eGreen can learn 'what Majestic does with' some of the Materials of Concern.
5. No evidence of sampling of OERC's downstream shipping documents (8.8.2.6) were provided to BAN, nor evidence of completing the remainder of requirements in the downstream due diligence section of the Standard (8.8.2), e.g. a required onsite audit prior to the first shipment of MOCs going to a new IDP and internally-approved annual desk audits. The contract with OERC dated 3/15/21 was wholly inadequate for an IDP managing MOCs, and appears to be based on an old version of the e-Stewards Standard (V 3.1).
6. eGreen's certification body performed a formal audit in late Feb/early March 2022 and determined a nonconformity for downstream due diligence, stating (among other things) that *"Initial Due Diligence and subsequent annual desk audits could not be located for [nine downstream providers were listed]"*. Although this non-conformity was eventually closed out with a plan, this audit result indicates a pattern of failure to perform adequate due diligence.
7. No proof of the sanitization of data or the absence of data on the two printers sent to OERC was provided to BAN. Proof of data sanitization or destruction is required.

Conclusions and Remedy

This investigation began with evidence obtained from two trackers placed in two printers and dropped off at eGreen IT Solutions in Phoenix, AZ six months apart. These two printers ended up in the Philippines and Malaysia respectively (see Appendices 1 and 2) in violation of the e-Stewards Standard's export rules. When BAN presented eGreen with a DRAFT Evidentiary Report as required in the e-Stewards Critical Non-Conformity Policy, eGreen's responses included new evidence of additional and repeated wrongdoing -- essentially of transferring 1982 pounds of printers (MOCs) to Olgin Efune Recycling Company (OERC), without ever approving them as an Immediate Downstream Processor for those restricted materials. Such approval of any company that will manage an e-Steward's MOCs is required prior to sending even the first shipment to them. Subsequently, BAN gave eGreen multiple opportunities to provide counter evidence and/or missing documentation, without receiving satisfactory evidence or explanations regarding printers.

Based on eGreen's Outbound Reports of shipments to OERC and ambiguous emails between eGreen and OERC, it initially appeared that MOCs other than printers may have also been shipped to the unapproved OERC. However, eGreen appealed that portion of the earlier Evidentiary Report; in response, BAN requested specific evidence to refute the inclusion of additional MOCs (besides printers), and ultimately revised the ER to exclude other MOCs.

However, based on evidence obtained, repeated efforts inviting eGreen to provide counter-evidence or missing documents, and the e-Stewards CNC Policy, BAN's Executive Director has determined that the following Critical Non-Conformities have occurred:

1. Willful violation of the export restrictions (8.7 Control of Transboundary Movement) in the Standard

Subsection 1.3.2.1 a. of the CNC Policy identifies 'willful violation of the import/export provisions of the Standard' as a critical non-conformity. Records provided by eGreen indicate they could not approve Olgin Efune Recycling Company (OERC) in March 2021 as an Immediate Downstream Provider for Materials of Concern as they were "waiting for further downstream information for final approval", and still had not approved them by November 2022 when eGreen was served with the Draft CNC Evidentiary Report. Meanwhile, at least two shipments including 1982 lbs. of printers went from eGreen to OERC in June and December of 2021, at the same time two trackers went from eGreen through OERC to developing countries.

2. Willful, long-term violation of 8.8.2 Downstream Due Diligence

While eGreen unsuccessfully attempted to approve OERC as an Immediate Downstream Processor for their MOCs over the course of 21 months, eGreen transferred multiple shipments of printers to them (see Appendix 6) in violation of the Standard. eGreen was unable to provide BAN with an initial onsite audit report, completed annual desk audits, an adequate contract with OERC, etc. But eGreen did provide a Downstream Processor Questionnaire from OERC indicating they shipped printers "as is" to Malaysia.

Furthermore, eGreen's certification body audit report and BAN's Performance Verification audit report both identified and communicated to eGreen its nonconformities with downstream due diligence requirements in 2022 and 2021 respectively.

Subsection 1.3.2.1 e. of the CNC Policy includes the following as cause for a finding of a CNC:
“e. Actions other than those above, which, as judged by the Executive Director of BAN to have, or are likely to, seriously endanger the credibility and viability of BAN or the e- Stewards program. This may include a pattern of repeat major nonconformities, such as repeated failure to perform adequate downstream accountability requirements.”

The failure to perform adequate due diligence on downstream vendors and control transboundary movement of toxic materials not only resulted in the violation of international waste trade laws, but also likely caused long-term impacts on both workers and the environment in the recipient developing countries. These impacts violate the central purpose for the e-Stewards program.

As a result of these two Critical Non-Conformities, and consistent with section 1.5.1 a) of the CNC Policy, BAN has determined that eGreen IT Solutions’ e-Stewards license will be withdrawn for a minimum of two years. It will remain withdrawn after the two-year period unless and until BAN and an accredited e-Stewards certification body approve eGreen’s complete recertification, including verifying evidence that downstream due diligence, top management commitment, adequate resources, and the entire Stewardship Management System are operating consistent with the applicable Standard at that time.

It was also decided that a public announcement of the Critical Non-Conformities and the decision to withdraw eGreen IT Solutions’ e-Stewards license and therefore certification is necessary so that customers and other interested parties will be notified of the change in eGreen IT Solutions’ status.

END

Appendices

APPENDIX 1

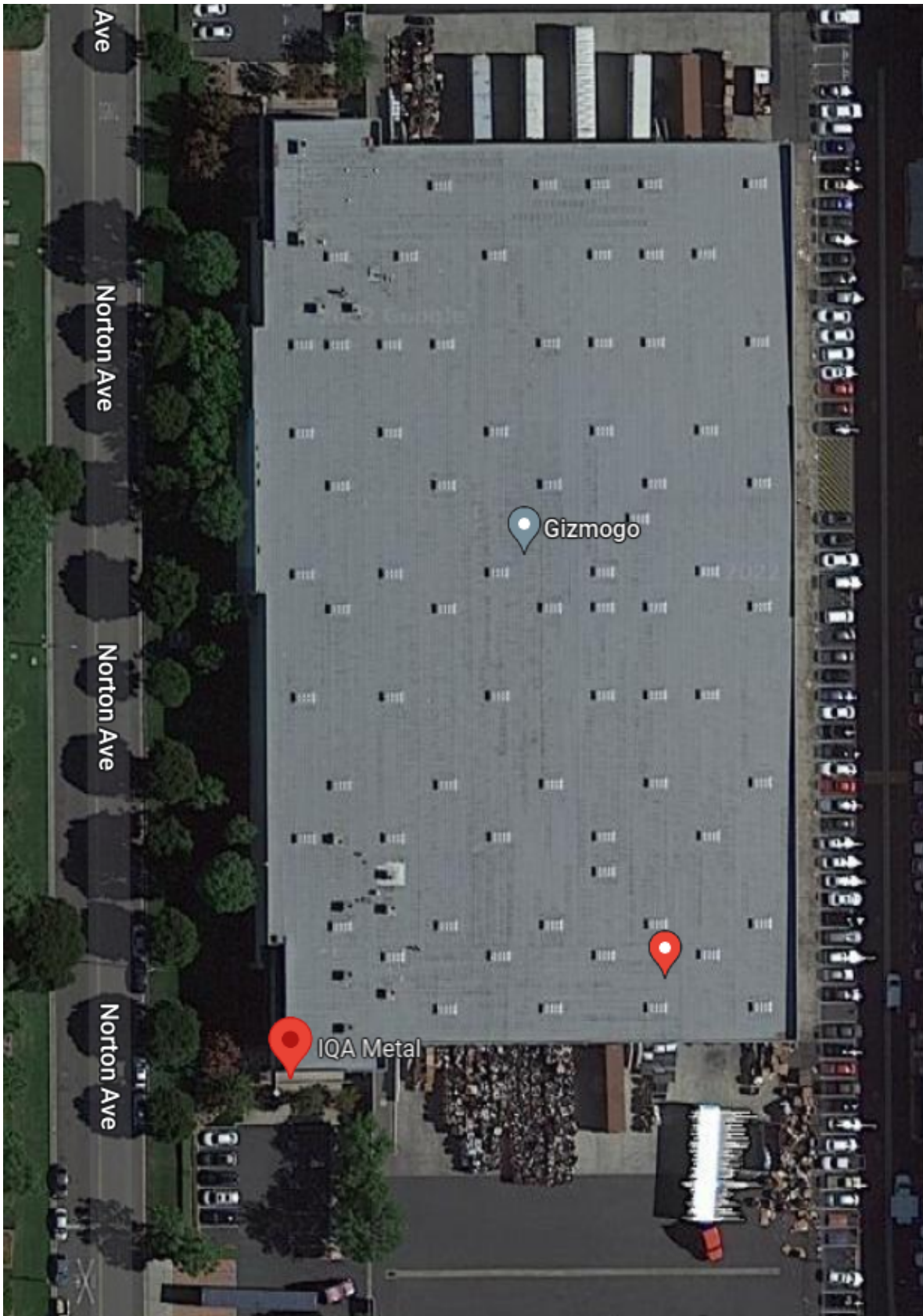
Data (Dates, Locations, and Satellite Photos) Pertaining to Tracker # PV062343

eGreen IT Solutions, LLC

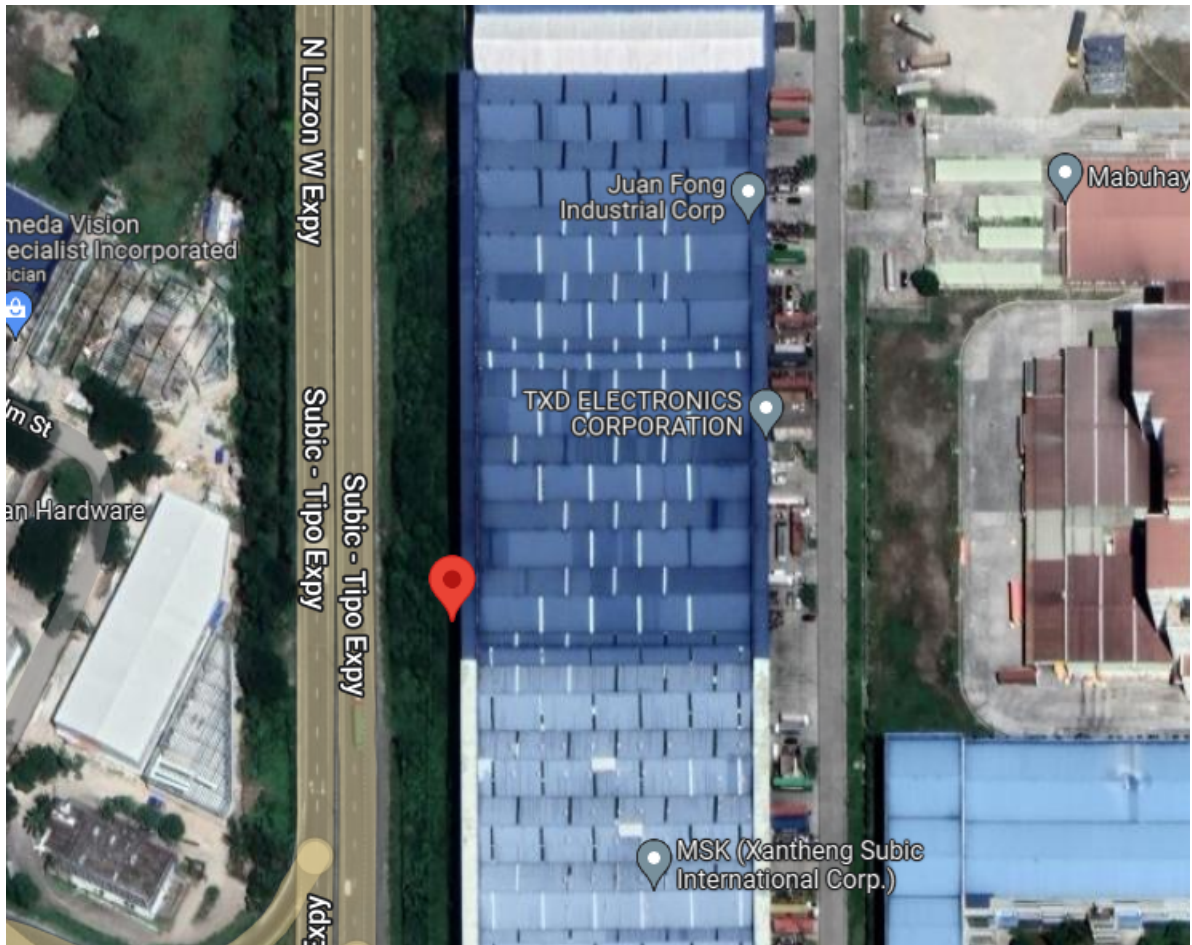
GPS Tracker Number	Type of e-Waste	Date of Deployment	Date of Arrival	Location of Tracker	Chain of Export Summary
PV062343	HP Printer (serial # CN99HH 34B4)	June 7, 2021		Arizona, USA	eGreen IT Solutions LLC 11034 N 23rd Dr #107 Phoenix, AZ 85029
			June 10 - Aug. 3, 2021	Arizona, USA	Olgin Efune Recycling Company 2449 W Madison St Phoenix, AZ 85009 GPS 33.444351, 112.111375
			Aug. 4 - Aug. 18, 2021	California, USA	IQA Metal 13825 Norton Ave Chino, CA 91710 GPS 34.002273, 117.710099
			Nov. 19 - Nov. 22, 2021	Zambales, Philippines	TXD Electronics Corporation Subic Bay Freeport Zone Zambales, Philippines GPS 14.822364, 120.303901



Google Satellite view of Olgin Efune Recycling Company, Phoenix, Arizona



Google Satellite view of IQA Metals, Chino, California



Google Satellite view of TXD Electronics Corporation, Zambales, Philippines

APPENDIX 2

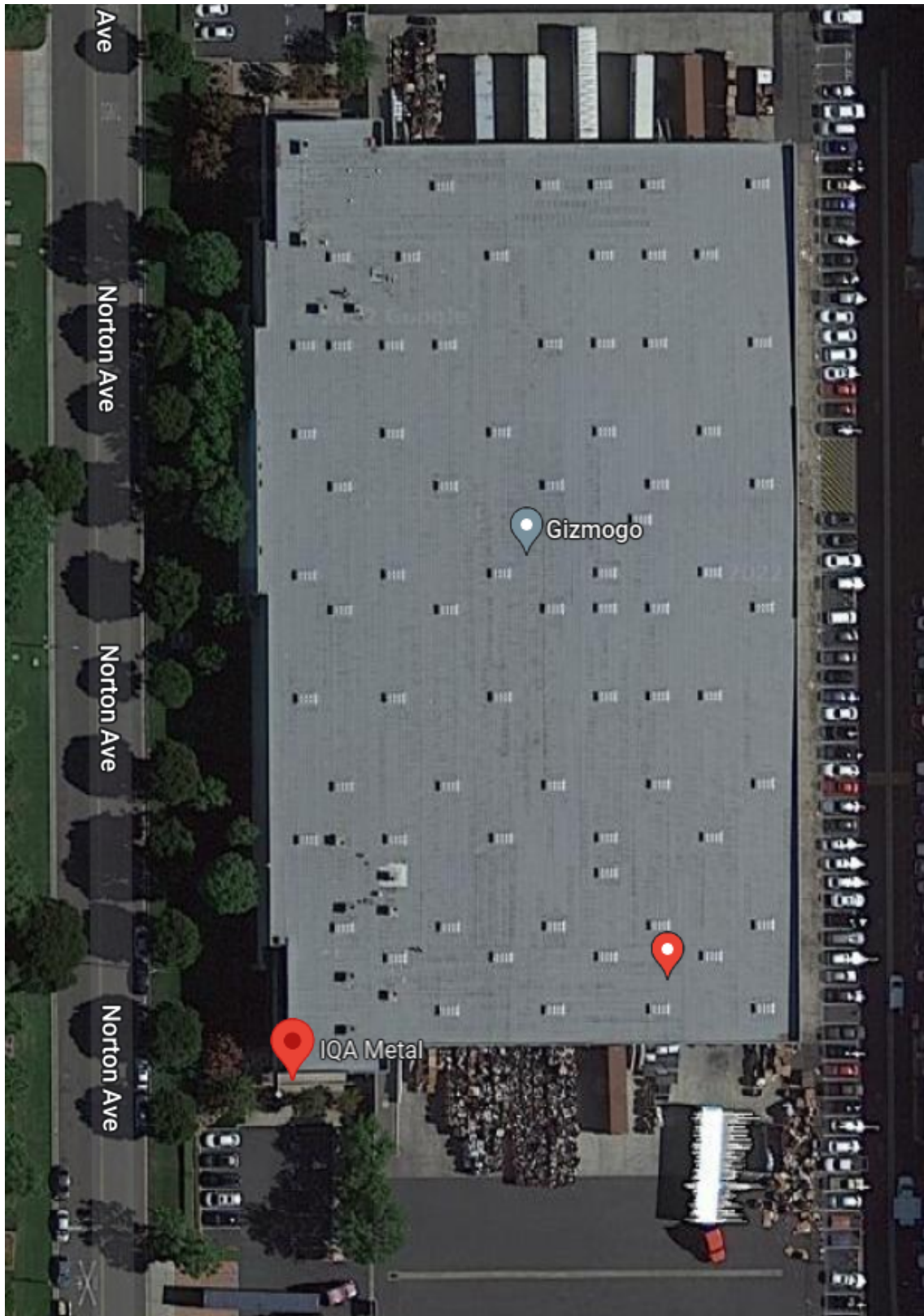
Data (Dates, Locations, and Satellite Photos) Pertaining to Tracker #PV081145

eGreen IT Solutions, LLC

GPS Tracker Number	Type of e-Waste	Date of Deployment	Date of Arrival	Location of Tracker	Chain of Export Summary
PV081145	Lexmark Printer (serial # 444824 9901TWR)	Dec. 9, 2021		Arizona, USA	eGreen IT Solutions LLC 11034 N 23rd Dr #107 Phoenix, AZ 85029
			Dec. 13, 2021 - Jan. 13, 2022	Arizona, USA	Olgin Efune Recycling Company 2449 W Madison St Phoenix, AZ 85009 GPS 33.444351, 112.111375
			Jan. 13 - March 8, 2022	California, USA	IQA Metal 13825 Norton Ave Chino, CA 91710 GPS 34.002273, 117.710099
			May 18 - May 21, 2022	Selangor, Malaysia	7 Jalan Bukit Kemuning, Shah Alam, Selangor, MY GPS 3.014519, 101.519811
			May 22, 2022	Selangor, Malaysia	22 Jalan Damar 9, Pelabuhan Klang, Selangor, MY GPS 2.982474, 101.432718



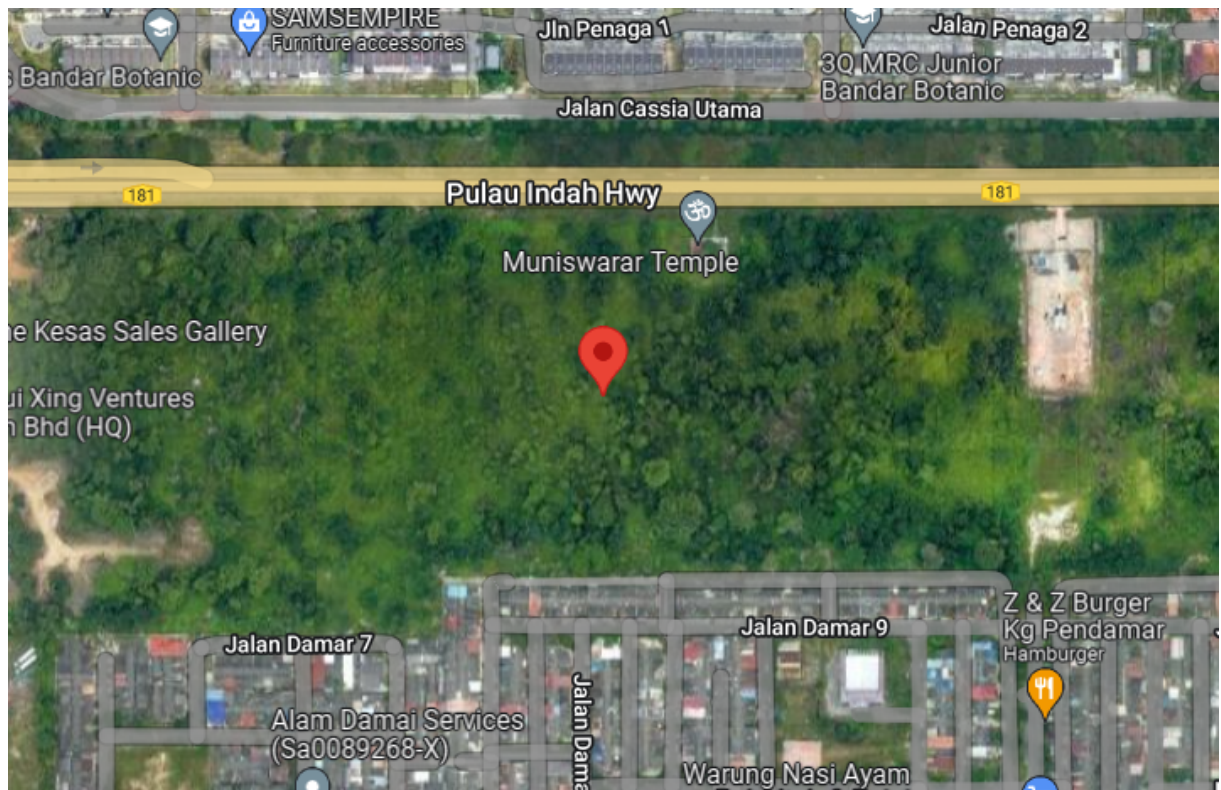
Google Satellite view of Olgin Efune Recycling Company, Phoenix, Arizona



Google Satellite view of IQA Metals, Chino, California



Google Satellite view of the Malaysian 1st site, Selangor, Malaysia



Google Satellite view of the Malaysian 2nd site, Selangor, Malaysia

APPENDIX 3

eGreen IT Solutions Downstream Disposition Chart (non-essential information deleted)

Tier	Downstream Provider Name	Materials Handled	Contact Info	Physical address of Processing or Final Disposal facility	Address for the headquarters office	Type of Operations	Alternative Uses?	e-Steward Status
1	Broadway Metal Recycling	Battery, Circuit Boards, LCDs (working), Printers	Dustin Martin	3330 W Broadway Rd Phoenix, AZ 85041		R2 Scrap Yard		NA
3	LS-Nikko	Printers	Dustin Martin	20th Floor ASEM Tower, Trade Center, 517 Yeongdong-Daero Gangnam- GU, Seoul, Seoul, Korea (South)		Shredding, Smelting		NA
1	Olgin-Efune	Ferrous & Non-Ferrous	Reyes Rendon	2449 W Madison St Phoenix, AZ 85009		Final		NA

APPENDIX 4



Desk Audit Checklist

Name of Downstream Provider: Olgin Efune Recycling

1. Downstream Provider Questionnaire

- a. Sent the Downstream Provider Questionnaire: 3-15-2021
- b. Received and filed signed Downstream Provider Questionnaire: 3-15-2021

2. MOC Management Plan

- 1) Evidence Downstream Provider follows Stewardship Policy:
Could not provide adequate information
- 2) Evidence Downstream Provider meets e-Stewards Responsible management of EE requirements:
Saw their shredder – inquiry - printers
- 3) Evidence Downstream Provider meets e-Stewards Reuse and Refurbishment requirements:
NA – no product that eGreen sends is for reuse nor refurbishment
- 4) Evidence Downstream Provider meets e-Stewards Materials Recovery and Final Disposition requirements:
Olgin is final processor
- 5) Evidence Downstream Provider meets e-Stewards Transboundary Movement requirements:
NA
- 6) Evidence Downstream Provider meets e-Stewards Downstream due diligence:
NA



Desk Audit Checklist

3. Evidence Downstream Provider effectively implements environmental, health, and safety controls, as well as monitoring to prevent exposure and release of toxic substances such as lead, mercury, and cadmium, either by maintaining accredited ESHMS certification or documented system to manage legal and regulatory requirements, environmental, health, and safety risks and continually evaluating and improving that system and reducing the negative EH&S impacts of their operations accordingly.

- a. Certification: _____ (Attach evidence)
b. Other: _____ (Attach evidence)

4. Summary:

Approved _____

Not Approved X – waiting for further downstream information for final approval –

Date of Completed Desk Audit: 3-20-2021

Completed By: KH

If Approved, date added to the Downstream Disposition Chart _____

Appendix 5

Excerpts from eGreen's Downstream Provider Questionnaire for OERC, dated 7/4/22, in eGreen's ongoing unsuccessful attempt to approve OERC as an Immediate Downstream Provider, while sending printers to them



Downstream Provider Questionnaire

VENDOR COMPANY INFORMATION	
Company Name: Olgin Efune Recycling Company	
Facility Address: 2449 W Madison St, Phoenix, AZ 85009	
Mailing Address (if different from above):	
Contact Name: Brad Efune	
Phone: 602-531-3519	Fax:
E-Mail: brad@oerc.com	Company Website: www.oerc.com

(See more excerpts from same Questionnaire below)

MATERIALS PROCESSED for eGreen IT Solutions: Check all that are applicable; <input type="checkbox"/> PCBs capacitors/PCB ballasts (polychlorinated biphenyls) <input type="checkbox"/> Mercury <input type="checkbox"/> Mercury containing devices (fluorescent tubes, laptops, LCD displays, LCD televisions) <input type="checkbox"/> CRT or CRT Glass (monitors, televisions, misc. equipment) <input type="checkbox"/> Batteries <input type="checkbox"/> Circuit Boards <input checked="" type="checkbox"/> Material containing Circuit boards (computer towers, printers, keyboards, mice, fax machines, copiers, etc.) <input type="checkbox"/> Other: _____ <input type="checkbox"/> Other: _____	Monthly Capacity: (In Pounds): Roughly 15,000 lbs
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eGreen IT Questionnaire
 Effective Date: 04-20-20

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PROCESS INFORMATION Please describe the processes used to handle eGreen IT Solutions' materials: <ol style="list-style-type: none"> 1. Material is received at OERC facility 2. Material is transferred to E Scrap or Non Ferrous scrap department depending on the material type 3. E Scrap is dismantled or prepared for shipment as is 4. Non Ferrous scrap is processed and prepared for shipment 5. Material is shipped out for final melting and recycling processes

PROCESS INFORMATION Please indicate all materials generated by the processing of eGreen IT Solutions' material and the sub-vendors used to process the material further.		
Material Generated	How are the materials processed or disposed? (Include Processing technology, if applicable.)	Material Final Destination (Include vendor name and address)
Circuit Boards	They are manually taken out of PC towers and sent for smelting in Asia	Mitsubishi Mining and Metals-Yokohama, Japan
Power Supplies & Computer Fan	Manually taken out from PC Tower and sent to Asia for further processing	Majestic Corporation – Port Klang West, Malaysia
Ferrous	Manually taken out from PC Towers	CMC Steel, Mesa Arizona
Printers	Shipped as is	Majestic Corporation – Port Klang West, Malaysia
Insulated Copper Wire	Shipped as is	Majestic Corporation – Port Klang West, Malaysia

Form Completed By: (Name and Title) Brad Efune – President	Signature:	Date: 07/04/22
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Appendix 6

A few of eGreen's Outbound Reports indicating MOCs transferred to Olgin Efune Recycling Company (OERC), which was never approved as an IDP



P: 602 944-4151

11034 N 23rd Dr - Ste 107
Phoenix, AZ 85029, USA

ORDER # OUT-10016
Customer: Olgin-Efune Recycling Co
Date: 06/10/2021 03:05 PM
Order Date: 06/10/2021
Account Rep: Karin Harris
Customer Contract #
Status: Settlement Complete
Shipping Method: Our Trucking

Outbound Report

OUT-10016

Pickup Address: eGreen IT Solutions LLC
admin admin
11034 N 23rd Drive
Suite 107
Phoenix, AZ 85029
USA
P: 602 944-4151

Ship To: Olgin-Efune Recycling Co
Reyes Rendon
2449 W Madison St
Phoenix, AZ 85009
USA
P: 602.595.6977

Pallets: 9

Product	LOT ID	Packaging	Unit Count	Gross Weight	Tare	Net
Printer - Mixed	8120	Pallet	0	852.00 lbs	35.00 lbs	817.00 lbs
DAL - Aluminum - Dirty	8134	Pallet	0	519.00 lbs	35.00 lbs	484.00 lbs
Transformer - Adapter	8136	Pallet	0	537.00 lbs	35.00 lbs	502.00 lbs
MIX - Metal - Mixed	8118	Gaylord	0	605.00 lbs	68.00 lbs	537.00 lbs
MTR - Motors - Low Grade	8137	Gaylord	0	619.00 lbs	68.00 lbs	551.00 lbs
WIR - #2 Ins Wire	8148	Gaylord	0	595.00 lbs	68.00 lbs	527.00 lbs
COP - #2 Copper	8149	Gaylord	0	347.00 lbs	68.00 lbs	279.00 lbs
PRS - Printers	8062	Loose	1	309.00 lbs	0.00 lbs	309.00 lbs
Metal - Fe	8150	Loose	3	300.00 lbs	0.00 lbs	300.00 lbs

Gross Weight: 4683.00 lbs
Tare Weight: 377.00 lbs
Net Weight: 4306.00 lbs

Receiver: Karin Harris
Loading Complete: 06/10/2021 03:05 PM

Page 1 of 1



Outbound Report

OUT-10286

P: 602 944-4151

11034 N 23rd Dr - Ste 107
Phoenix, AZ 85029, USA

ORDER # OUT-10286
Customer: Olgin-Efune Recycling Co
Date: 12/13/2021 07:57 AM
Order Date: 12/13/2021
Account Rep: Karin Harris
Customer Contract #
Status: Settlement Complete
Shipping Method: Our Trucking

Pickup Address: eGreen IT Solutions LLC
admin admin
11034 N 23rd Drive
Suite 107
Phoenix, AZ 85029
USA
P: 602 944-4151

Ship To: Olgin-Efune Recycling Co
Reyes Rendon
2449 W Madison St
Phoenix, AZ 85009
USA
P: 602.595.6977

Pallets: 10

Product	LOT ID	Packaging	Unit Count	Gross Weight	Tare	Net
PCS - Computers - Incomplete Whole Computers	11532	Pallet	0	1000.00 lbs	35.00 lbs	965.00 lbs
UPS - Uninterrupted Power Supplies	11546	Pallet	0	1441.00 lbs	35.00 lbs	1406.00 lbs
PRS - Printers	11549	Pallet	0	891.00 lbs	35.00 lbs	856.00 lbs
PCS - Computers - Incomplete Whole Computers	11561	Pallet	0	1020.00 lbs	35.00 lbs	985.00 lbs
PCS - Computers - Incomplete Whole Computers	11565	Pallet	0	1072.00 lbs	35.00 lbs	1037.00 lbs
MIX - Metal - Mixed	11514	Gaylord	0	538.00 lbs	68.00 lbs	470.00 lbs
CAL - Aluminum - Clean	11515	Gaylord	0	402.00 lbs	68.00 lbs	334.00 lbs
PCB - Broken - All in Ones	11516	Gaylord	0	814.00 lbs	68.00 lbs	746.00 lbs
TFS - Transformer	11533	Gaylord	0	973.00 lbs	68.00 lbs	905.00 lbs
MIX - Metal - Mixed	11557	Loose	6	1037.00 lbs	0.00 lbs	1037.00 lbs

Gross Weight: 9188.00 lbs
Tare Weight: 447.00 lbs
Net Weight: 8741.00 lbs

Receiver: Karin Harris

Loading Complete: 12/13/2021 07:57 AM

APPENDIX 7

Email from eGreen to OERC, which received multiple shipments of MOCs without being approved as an Immediate Downstream Provider

From: Karin Harris <[REDACTED]@egreenits.com>
Sent: Monday, October 10, 2022 11:47 AM
To: Brad Efune <[REDACTED]@oerc.com>
Cc: Reyes Rendon <[REDACTED]@oerc.com>
Subject: RE: Downstream Disposition Chart

Good Morning Brad!

Hope you are doing well. Wanted to circle back around. Our internal audit is coming up so I have to get on it. The spreadsheet is coming along but needs more information to substantiate complete responsibility.

Here are the items we send. What needs to be understood is the process of processing the items. As the chart stands right now, it indicates that OERC doesn't do anything with any electronics and sends them all to Majestic Corporation for processing. If this is true, then we would need to know what Majestic does with the following materials:

- Boards
- Spent Lamps or Lamps from LCD Monitors
- Plastics from the items
- Batteries (button batteries - lithium ion)

The determination of what materials are handled by OERC depends on what is done with the product.

What is the process for:

- LCD Monitors (broken yields plastic, mercury lamps, boards)
- Mid-Grade Electronic Scrap
- Business Phones
- Whole Laptops
- Sealed Lead Acid Batteries - UPS – whole units
- Whole Computers (CPUs)
- Network Equipment
- Servers
- Printers

Let me know.

Respectfully,
Karin

Karin L Harris
President/Owner
eGreen IT Solution LLC
11034 N 23rd Drive – Suite 107
Phoenix, AZ 85029