

Attachment C: Activities and Procedures for the Management of Covered Electronic Devices (CEDs)

Please complete this form in accordance with CGS section 22a-629 and RCSA section 22a-638-1(b). The purpose of this attachment is to provide a step-by-step description of the material flow in sequential order from the initial point of collection from residents until CEDs and the components of CEDs are processed into raw materials or products and the waste and/or residue from the recycling of CEDs is disposed of. For more details, see [Instructions for Completing the Application Form to Become a CER](#) [DEEP-E-WASTE-INST-002].

There are three parts to Attachment C:

- C-1 – Disclosure of Business Partners
- C-2 – Written Narrative – Upstream, Downstream and Other Procedures
- C-3 – Process/Material Flow Diagram for CEDs and Components of CEDs – to be attached

Part C-1 – Disclosure of Business Partners

Use Table C-1 to list basic information about all business partners used to manage CEDs, including:

- Certain Transporters (**up to initial recycling facility**). An Attachment E must also be completed and submitted for each facility/company.
- All Facilities Incidental to Transportation. An Attachment E must also be completed and submitted for each facility/company.
- All Recycling Facilities. A business partner that stores for more than 10 days whole CEDs (or components of CEDs that are MOCs or contain MOCs) is also considered a “Recycling Facility” and must be identified in Table C-1. In addition, an Attachment D must also be completed and submitted for each facility/company that stores or recycles MOCs.
- All Disposal Facilities (waste or residue disposal facilities). In addition, an Attachment D must also be completed and submitted for each facility/company that disposes of waste or residue from the recycling of MOCs.

Note: Do not include in Table C-1 the initial points of collection/ collection locations used to collect CEDs from residents. The initial collection points will need to be addressed in section C-2-A of this application.

For each business partner listed in the left hand column, complete the respective information in the adjacent columns.

You can add rows to the table by selecting tab in the last row, in the last column.

If a business partner acts as more than one facility type, list the business partner again for each facility type it represents and provide applicable information on a separate row.

Table C-1: Disclosure of Business Partners

Name of Facility/Company	Address	Facility Type (See instructions for list)	Brief Process/ Activity Description	Materials Received (See instructions for list)	MOCs (See instructions for complete list)
<i>Example</i> ABC Company	123 Main Street, Hartford, CT 06106	Recycling Facility	Accumulates & stores CEDs for greater than 10 days to be shipped to downstream partner	Computers, Monitors, Printers & Televisions	mercury containing materials, batteries, CRT glass, whole circuit boards, materials containing PCBs

Part C-2: Written Narrative

Response Format:

The written narrative must be organized according to the 3 basic sections presented below – regardless of whether the applicant uses the electronic form provided or not.

If you choose to provide any of the written narrative as a separate attachment, you must indicate the exact location of the response to each item in the corresponding space provided below (e.g., See attachment titled **Part C-2-A:2 Tracking Procedures, pgs. 6 – 10**).

Labeling Any Attachments:

Label each sheet with the applicant's name, identifying the corresponding attachment and associated part and question number, as indicated in the example below:

Applicant/Company Name: ABC Company
Attachment: C
Part: C-2-A:2 Tracking Procedures
Question: ii
Page(s): 6-10

The 3 basic sections of the written narrative component include:

- A. Upstream Procedures - beginning from the point(s) of initial collection of CEDs to a CER's facility (or other initial recycling facility) that dismantles whole CEDs.
- B. Downstream Procedures - beginning from a CER's facility to the point(s) where waste or residue is disposed from recycling of CEDs, components of CEDs or materials from CEDs.
- C. Other Procedures – includes Data Security, Exports, Reuse/Refurbishment and Environmentally Preferable Practices

C-2-A: Upstream Procedures

1. Initial Collection Points

Identify all types of initial collection points being used to collect CEDs from residents by selecting the applicable box(es).

Check all that apply:

- Public, Municipally-approved Collection Site (Municipal Transfer Station, DPW garage, etc.)
- Retail Location
- Temporary, Non-permanent (special or promotional event, one day, etc.)
- Regional (multiple municipalities)
- Private, Municipally-approved Site
- Curbside
- Other (specify): _____

C-2-A: Upstream Procedures (continued)

2. Tracking Procedures

Describe in detail the tracking procedures for each of the items listed below. The tracking procedures shall begin from all of the applicable point(s) of initial collection of CEDs and non-CEDs from consumers (as identified in section C-2-A:1 of this application) to the initial recycling facility, where CEDs are first dismantled, crushed, shredded or processed in a similar manner.

[The items below should be broken down into separate section headings based on each type of collection point identified in C-2-A:1 above, as applicable.]

- i. Procedures to ensure that CEDs came from a household in Connecticut:

- ii. Procedures to ensure that CEDs will be segregated and tracked separately from non-CEDs and other used electronics (i.e., tracking from the point of collection, including transportation, to the initial recycling facility):

- iii. Procedures to identify the brand owner of a CED, excluding televisions (i.e., brand sorting procedures):

- iv. Procedures to separate and return CEDs to a manufacturer, or to a facility designated by a manufacturer, including identification and storage until delivery to another facility:

- v. Procedures to ensure that CEDs for which a CER can obtain reimbursement from a manufacturer are kept separate from other electronic devices for which a CER cannot obtain reimbursement from a manufacturer:

C-2-A: Upstream Procedures (continued)

3. Recordkeeping/Billing Procedures

Describe in detail the system(s) that will be used to record and maintain the data required to properly bill manufacturers in accordance with the formulas and requirements of RCSA Section 22a-638-1(j).

- i. Recordkeeping/Billing System for Computers, Monitors and Printers: Demonstrate that only computers, monitors and printers from a household in CT are billed to the manufacturer and that billing is based on cumulative collected weight.
- ii. Recordkeeping/Billing System for Televisions: Demonstrate that only Televisions from a household in CT are billed to the manufacturer and that billing is based on the manufacturer's market share.
- iii. Recordkeeping System for Non-CEDs (Note: non-CEDs cannot be billed to manufacturers):
- iv. Describe in detail the applicant's quality assurance / quality control procedures for recording and maintaining data that ensures accurate billing methods as described in Items i, ii and iii above. These procedures shall include, but not be limited to, methods for calibrating scales that ensure accurate billing.

C-2-B: Downstream Procedures

Process Flow: Processes / Methods Used to Recycle CEDs or Components of CEDs by CER and its Downstream Vendors

Describe in detail the process flow of CEDs and components of CEDs as the materials are being processed by the CER and its downstream business partners. In addition to the written description provided below, provide a process flow diagram as Attachment C-3. Ensure that the description provided here is consistent with the process flow diagram provided as Attachment C-3.

For each material handled, beginning with the initial recycling facility to the points where CEDs or components of CEDs are processed into raw materials or products and waste or residue is disposed of from recycling of CEDs and components of CEDs, at a minimum, describe the processes and methods (i.e. disassembly and physical recovery operations such as crushing, shredding, grinding, glass-to-glass recycling) that will be used to recycle CEDs and components of CEDs.

If multiple facilities will be used for the same activity, include a description of the circumstances in which each facility will be used. The description shall include each recycling facility and each disposal facility used to recycle or dispose of CEDs or components of CEDs. Also include the mechanism for recording weights of the various materials handled in order to provide accurate annual reporting to the Department.

C-2-C: Other Procedures (Data Security, Export, Reuse/Refurbishment, Environmentally Preferred Practices)

1. Data Security Procedures

Describe in detail the procedures for data security and employee training at any recycling facility where hard drives are located in accordance with RCSA section 22a-638-1(e)(2).

C-2-C: Other Procedures (continued)

2. Export Procedures

- i. Describe whether and how CEDs or components of CEDs will be re-used, refurbished, or recycled once exported.

- ii. Disclose all of the countries which CEDs or components of CEDs are to be exported and the countries through which CEDs or components of CEDs will travel and the import and export requirements for all such countries.

- iii. Provide procedures for determining the disposition of all off-specification CEDs or components of CEDs, CEDs or components of CEDs that may break in transit or CEDs or components of CEDs that are not reused, refurbished or recycled for other reasons.

- iv. Describe how the applicant will ensure that CEDs and components of CEDs will be managed prior to export, unless the export is for legitimate reuse or refurbishment. The applicant or any person on behalf of the applicant shall ensure that: 1) materials of concern have been removed and handled separately (unless it is a OECD country); and 2) CRTs and CRT glass have been adequately processed for use as an industrial feedstock in accordance with RCSA section 22a-638-1(c)(6)(C)(ii).

Indicate “Not Applicable” if no CEDs or components of CEDs are exported and indicate why:

C-2-C: Other Procedures (continued)

3. Reuse / Refurbishment Procedures

Note: CEDs that are reused or refurbished cannot be billed to manufacturers.

- i. Define procedures for pre-screening of CEDs.
- ii. Define procedures to ensure erasure or destruction of data meets requirements.
- iii. Define procedures for labeling, packaging, storing and transporting CEDs.
- iv. Define procedures ensuring that CEDs meet legitimate reuse and refurbishment specifications.
- v. Provide the procedures for determining the disposition of off-specification CEDs or CEDs that may break in-transit.

Indicate "Not Applicable" if no CEDs are Reused/Refurbished.

C-2-C: Other Procedures (continued)

4. Environmentally Preferred Practices

Provide a description of the environmentally preferred practices used by business partners identified in Table C-1. This includes, but is not limited to, LEED, ISO 14001, e-Stewards, R2 certifications, any energy efficient practices, alternative fuels, and fleet operations.

Part C-3: Process Flow Diagram for CEDs and Components of CEDs

Attach a process flow diagram which includes all upstream and downstream business partners. Ensure consistency between the business partners identified in Table C-1, section C-2-A:1 and the written description of downstream process flow provided in C-2-B of this form.

Check here to indicate that a separate process flow diagram is attached to this section of the application. Be sure to label all sheets of this attachment with the applicant's name and the title of this attachment "Part C-3: Process Flow Diagram".