



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL
DIVISION OF WASTE AND HAZARDOUS SUBSTANCES
SOLID AND HAZARDOUS WASTE MANAGEMENT SECTION

89 KINGS HIGHWAY
DOVER, DELAWARE 19901

TELEPHONE: (302) 739-9403
FAX: (302) 739-5060

RECYCLING PERMIT #SW-17/04

Effective Date: November 15, 2017
Original Issue Date: November 15, 2013
Expiration Date: November 15, 2020

Facility Name: Guardian Data Destruction, Inc.
Mailing Address: 71 Schrieffer Street
South Hackensack, New Jersey 07606
Facility Phone Number: (718) 609-1685

Contact Person: Michael Sirota, Vice President
Phone Number: (646) 529-6344

Alternate Contact Person: Mike Alev, Director of Operations
Phone Number: (718) 609-1685

Location of Approved Activity: Designated Guardian vehicle used throughout the State of Delaware, clearly labeled as Guardian Data Destruction

I. GENERAL CONDITIONS:

- A. In accordance with Delaware's *Regulations Governing Solid Waste* (DRGSW), Section 2.5.2, the Department of Natural Resources and Environmental Control (the Department) issues Recycling Permit #SW-17/04 (Permit) to Guardian Data Destruction, Inc. (Guardian) for accepting and shredding computer hard drives and/or media tapes in a Guardian vehicle with shredding equipment for the sole purpose of recycling the shredded waste.
- B. This Permit shall be conducted in accordance with the conditions herein and with the following documents, as submitted to the Department: (1) Recycling Permit Application for shredding hard drives and/or media tapes and associated documents, dated September 2017; (2) Solid Waste Transporter Permit Application dated September 13, 2017; and (3) other procedures and policies specifically referenced in this Permit. Conditions of this Permit shall take precedence over any of the above listed documents. Failure to comply with any condition of this Permit or any provisions within the aforementioned documents is a violation of this Permit.

Delaware's good nature depends on you!

- C. Upon request, Guardian shall present a copy of this Permit to any law enforcement officer or representative of the Department.
- D. Guardian shall notify the Department in writing within twenty-four (24) hours of any changes in the ownership, operators, name, or company officials.
- E. Guardian shall notify the Department in writing at least thirty (30) days prior to the anticipated need to implement any change to waste characteristics, changes that will alter the beneficial use of the incoming waste material or of the shredded hard drives and media tapes, or changes to processes, operations, or procedures described in the Application documents referenced above in section I.B., or to this Permit. Guardian shall not implement said changes unless and until they have been notified in writing of the Department's agreement to the change(s).
- F. This Permit may be modified by the Department at any time, including additional limitations, requirements and/or special conditions. In the event the regulations governing activities authorized in this Permit are revised, this Permit may be modified.
- G. In the event that any condition of this Permit cannot be achieved or is violated, Guardian shall immediately notify the Department and take action to correct the violation.

II. GENERAL OPERATING CONDITIONS:

- A. Security
Access to the Guardian vehicle shall be controlled to prohibit the entry of unauthorized individuals.
- B. Access
Representatives of DNREC may, at any reasonable time, inspect the operations described herein to verify compliance with the requirements of this Permit, DRGSW, Delaware's *Regulations Governing Hazardous Waste* ("DRGHW"), and 7 Del. C. Chapters 60 and 63.
- C. Dust control
Guardian shall provide adequate ventilation to prevent the ingestion or inhalation of toxic dust from the shredding process.
- D. Fire safety
Guardian shall manage all hard drives and media tapes in order to prevent the possibility of fires.
- E. Employee Health and Safety
Employees shall work under appropriate health and safety guidelines established by the Occupational Safety and Health Administration. Use of personal protective equipment shall be in accordance with 29 CFR Part 1910.132 as a minimum. First aid equipment shall be maintained and available on the Guardian vehicle. Emergency telephone numbers of nearby ambulance, hospital, police and fire services shall be prominently displayed in Guardian's vehicle.
- F. Equipment Usage, Inspection and Maintenance
The equipment consists of a shredder and Guardian vehicle. The Guardian vehicle shall be completely enclosed and sealed from external conditions and tampering. Guardian will use a combination of this equipment and manual labor to process the incoming waste material and to handle the final shredded waste. All operating equipment shall be operated and inspected in accordance with the manufacturer's recommendation, permits, and this Permit. Equipment shall be maintained and operated in a manner that protects Guardian employees, the public and the environment.
- G. Training

Within 180 days of hiring, all employees who are to work with the shredder shall have received initial training in (1) Health and safety procedures, (2) Fire prevention and protection, and (3) Emergency first aid. Prior to working the shredder, employees shall receive training in equipment operation conducted by the equipment manufacturer's representative or another person specifically knowledgeable in the operation of the equipment. Training shall include the manufacturer's operating and maintenance manual, operation instruction, equipment safety features, and hazards that might be encountered. Unless otherwise specified by a nationally recognized training provider (for example, the American Red Cross as a training provider for First Aid), training shall be required initially and annually thereafter.

H. Recordkeeping:

1. Training records shall be immediately provided to the Department upon request. These records will document that the required training has been provided to all employees who are to work in the shredding area.
2. All data required by this Permit shall be recorded and maintained by Guardian for a minimum of three (3) years and immediately made available to the Department upon request, including:
 - a. Volume or tonnage of shredded hard drives or media tapes from each of Guardian's clients, for each shredding event and location.
 - b. Bills of lading for shipment of shredded hard drives and media tapes for recycling.
 - c. Reports from all recycling facilities used including weight of the recycled waste and Certificate of Recycling, or equivalent documentation.
 - d. Training records.

I. Reporting:

1. Quarterly:

The following information is required on a quarterly basis, to be received by the Department no later than the 15th (April 15th, July 15th, October 15th, January 15th) after every calendar quarter:

 - a. The number of bins containing hard drives and media tapes accepted from each client, listed by date and shredding event location
 - b. The weight of shredded hard drives and media tapes sent for recycling, listed by client and shredding event location
 - c. Reports from all recycling facilities including weight of the shredded waste that was recycled and associated Certificate of Recycling, or equivalent documentation.
2. Annually:

No later than February 1 of each calendar year, Guardian shall submit an annual report for the previous calendar year which includes a summary of all of the information submitted in the quarterly reports. This report can be sent via email to Mindy.Anthony@state.de.us or a hard copy can be mailed to:

Mindy Anthony
DNREC-SHWMS
89 Kings Highway
Dover, DE 19901

J. Authorized Waste:

Hard drives and media tapes that, prior to shredding, do not contain mercury switches, mercury relays, nickel-cadmium batteries and lithium batteries.

K. Prohibited Waste:

Guardian shall exercise reasonable care to ascertain whether waste accepted by the facility is prohibited waste, and shall not accept the following prohibited waste, including, but not limited to:

1. Hard drives and media tapes containing mercury switches, mercury relays, nickel-cadmium batteries or lithium batteries
2. Personal computers, servers, or other electronic components
3. Plastics, glass, metal
4. Mixed municipal solid waste (trash/garbage), tires
5. Batteries
6. Sewage sludge and septage
7. Petroleum-containing materials or wastes
8. Infectious and medical wastes, radioactive materials, universal wastes or hazardous wastes

Reasonable care shall include contacting the individual generator if a visual determination regarding the acceptability of the waste material cannot be made. Any loads that appear to contain any of the prohibited wastes listed above shall be rejected and removed immediately.¹

III. WASTE ACCEPTANCE, PROCESSING, AND STORAGE:

A. Procedures for Waste Acceptance

Waste acceptance and processing shall be conducted in accordance with Guardian's submitted *Shredding Process and Operation Protocol Document*, DRGSW, DRGHW, Delaware Code, and the conditions below.

1. All hard drives and tapes shall be removed from the computer prior to acceptance.
2. All mercury switches, mercury relays, nickel-cadmium batteries, and lithium batteries shall have been removed from all hard drives and tapes.
3. All hard drives and media tapes to be shredded shall be placed in Guardian's vehicle using covered and locked bins.
4. Hard drives and media tapes shall only be transferred back to the client in the event of a security breach.
5. If unauthorized wastes are found with a load of hard drives or media tapes, the unauthorized waste shall be lawfully managed onsite in a designated container and immediately returned to the generator for lawful disposal or recycling.

B. Procedures for Processing of Waste

1. All shredding shall take place inside Guardian's vehicle.
2. All shredded material shall be deposited into containers inside Guardian's vehicle. Once a container is full it shall be covered and shrink wrapped to a pallet.

C. Procedures for Storage of Waste

¹ For information on the proper handling and disposal of sewage sludge and septage, please contact the Division of Water at (302) 739-9946. For information on the proper handling and disposal of all other listed prohibited wastes, please contact the SHWMS at (302) 739-9403 and select option 8.

1. There shall be no storage of shredded hard drive or media tape waste at the location of the client.
2. At the conclusion of the on-site shredding event, all bins containing shredded waste shall be promptly transported in Guardian's vehicle to Guardian's New Jersey facility in preparation for shipment to a certified electronics recycler.

IV. STORAGE OF PRODUCT:

- A. Storage of shredded hard drive or media tape shall be in Guardian's vehicle only and shall be stored only for the duration and purpose of immediately transporting the shredded waste to Guardian's New Jersey facility in preparation for shipment to a certified electronics recycler.
- B. Once the shredding has been completed for a client, shredded waste shall not be stored in the Guardian vehicle for more than twenty-four (24) hours while in Delaware; except if an already scheduled shredding event is necessary to fill the vehicle to or near capacity. In that event, shredded waste shall not be stored in the Guardian vehicle for more than twenty-four (24) hours beyond the completion of the final shredding event for that vehicle.

V. BENEFICIAL USE AND APPLICATION:

All shredded hard drives and media tapes shall be sent to a certified electronics recycler approved to accept such waste. The electronics recycler shall obtain certification via an accredited, independent third-party auditor, such as is obtained via the Responsible Recycling ("R2") Standard for Electronics Recyclers or the e-Stewards® Standard for Responsible Recycling and Reuse of Electronic Equipment® ("e-Stewards®"). It is Guardian's responsibility to ensure that the appropriate recycling permits have been obtained and maintained by the recycler.

VI. CLOSURE:

- A. Guardian shall immediately notify the Department in writing the estimated date of facility closure and/or the date wastes will no longer be accepted.
- B. Guardian shall notify the Department in writing when closure activities are started, and again when closure is complete.
- C. Should Guardian cease the shredding of hard drives and media tapes, all hard drives and media tapes shall be properly disposed of or recycled. All disposal and recycling activities undertaken in this section must be conducted per the requirements of DRGSW and Delaware Code.

VII. ADDITIONAL CONDITIONS:

- A. Guardian shall maintain its Solid Waste Transporter Permit as long as it is required.
- B. Should Guardian desire to renew this Permit, Guardian shall submit a new application no later than 180 days prior to the Permit expiration date. Guardian may be required to submit additional documentation as needed at the Department's sole discretion.
- C. This Permit does not relieve Guardian, nor any of its clients, from complying with any other applicable Federal, State, or Local laws, regulations or ordinances.

- D. Any violation of any condition of this Permit, regulation promulgated by the Department, Secretary's Orders, or provision of 7 *Del. C.* Chapters 60 and 63, shall justify termination of this Permit, and implementation of appropriate enforcement action.
- E. Any violation of any regulatory law, regulation or ordinance for the New Jersey facility shall justify termination.

MODIFICATIONS AND RENEWALS

November 2, 2015: Renewed BUD #43/111517 without modification. Expiration date: November 15, 2017.

November 13, 2017: At time of renewal, transitioned Beneficial Use Determination ("BUD") Approval #43/111517 to Recycling Permit #SW-17/04. Added requirement for shredded hard drives and media tapes to be sent to a certified electronics recycler. Expiration date: November 15, 2020.



Jason W. Sunde
Environmental Program Manager
Solid and Hazardous Waste Management Section

11-13-17

Date

JWS: MBCA: srh
MBCA17012