



STATE OF DELAWARE  
DEPARTMENT OF NATURAL RESOURCES  
AND ENVIRONMENTAL CONTROL  
DIVISION OF WASTE AND HAZARDOUS SUBSTANCES  
COMPLIANCE AND PERMITTING SECTION

89 KINGS HIGHWAY  
DOVER, DELAWARE 19901

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

August 26, 2019

Mr. Cliff Madison, Transportation Supervisor  
Shred-It USA, LLC  
2 Nealy Boulevard  
Trainer, Pennsylvania 08648

Subject: Modification of Recycling Permit #SW-17/05  
Reference: Shred-It USA Permit #SW-17/05, File Code: 02.B

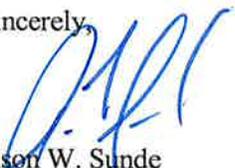
Dear Mr. Madison:

Enclosed is Recycling Permit #SW-17/05 ("Permit") from the Compliance and Permitting Section (CAPS). The Permit approves Shred-It USA, LLC ("Shred-It") to accept and shred computer hard drives in a Shred-It vehicle with shredding equipment for the sole purpose of recycling the shredded waste. Permit #SW-17/05 was granted for three years (3 yrs.) and will expire on November 25, 2020.

The enclosed permit has been modified to reflect personnel changes at Shred-It, subsequently necessitating changes to the Permit contact persons. In addition, revisions have been incorporated to reflect the restructuring of the Division of Waste and Hazardous Substances, specifically CAPS was formerly the Solid and Hazardous Waste Management Section ("SHWMS").

If you have any questions concerning this Permit, please contact Jeff Martin at (302) 739-9403.

Sincerely,

  
Jason W. Sunde  
Environmental Program Administrator  
Compliance and Permitting Section

Enclosure

JWS:JRM

**RECYCLING PERMIT #SW-17/05**

Effective Date: November 25, 2017  
Original Issue Date: November 25, 2013  
Modification Date: August 26, 2019  
Expiration Date: November 25, 2020

Facility Name: Shred-It USA, LLC  
Mailing Address: 2 Nealy Boulevard  
Trainer, Pennsylvania 19061

Contact Person: Cliff Madison, Transportation Supervisor  
Phone Number: (215) 645-0666

Alternate Contact Person: George Reisinger, Facility Manager  
Phone Number: (717) 629-1548

Location of Approved Activity: Designated Shred-It vehicle used throughout the State of Delaware, clearly labeled as Shred-It.

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**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-17/05 ("Permit") to Shred-It USA, LLC ("Shred-It") for accepting and shredding computer hard drives in a Shred-It vehicle with a shredder for the sole purpose of recycling the shredded hard drive 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 dated September 25, 2017 and associated documents; (2) Solid Waste Transporter Permit Application dated October 9, 2017; (3) ownership documents dated May 1, 2014; and (4) 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.
- C. Shred-It shall present, upon request, a copy of this Permit to any law enforcement officer or representative of the Department.
- D. Shred-It shall notify the Department in writing within twenty-four (24) hours of any changes in the ownership, operators, name, or company officials.
- E. Shred-It 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, or changes to processes, operations, or procedures described in the Application documents referenced above in section I.B., or to this Permit. Shred-It 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, Shred-It shall immediately notify the Department and take action to correct the violation.

## II. GENERAL OPERATING CONDITIONS:

- A. Security  
Access to the Shred-It 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  
Shred-It shall provide adequate ventilation to prevent the ingestion or inhalation of toxic dust from the shredding process.
- D. Fire safety  
Shred-It shall manage all hard drives 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 Shred-It vehicle. Emergency telephone numbers of nearby ambulance, hospital, police and fire services shall be prominently displayed in Shred-It's vehicle.
- F. Equipment Usage, Inspection and Maintenance  
The equipment consists of a shredder and Shred-It vehicle. The Shred-It vehicle shall be completely enclosed and sealed from external conditions and tampering. Shred-It will use a combination of this equipment and manual labor to process the incoming waste material and to handle the final shredded hard drive 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 Shred-It employees, the public, and the environment.
- G. Training  
All employees who are to work with the shredder shall have received initial training, within 180 days of hiring, 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 Shred-It 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 from each of Shred-It's clients, for each hard drive destruction event and location.
  - b. Bills of lading for shipment of shredded hard drives 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 15<sup>th</sup> (April 15<sup>th</sup>, July 15<sup>th</sup>, October 15<sup>th</sup>, January 15<sup>th</sup>) after every calendar quarter:

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

2. Annually:

No later than February 1 of each calendar year, Shred-It shall submit an annual report for the previous calendar year which includes a summary of all of the information submitted in the quarterly reports. Shred-It shall also submit documentation that all recycling facilities used in accordance with this Permit are current certified electronics recyclers. This report can be sent via email to [Mindy.Anthony@state.de.us](mailto:Mindy.Anthony@state.de.us) or a hard copy can be mailed to:

Jeff Martin

Delaware Department of Natural Resources and Environmental Control

Compliance and Permitting Section

89 Kings Highway

Dover, DE 19901

J. Authorized Waste:

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

K. Prohibited Waste:

Shred-It 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 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.<sup>1</sup>

### **III. WASTE ACCEPTANCE, PROCESSING, AND STORAGE:**

#### **A. Procedures for Waste Acceptance**

Waste acceptance and processing shall be conducted in accordance with Shred-It's hard drive destruction process submitted with their original application, DRGSW, DRGHW, Delaware Code, and the conditions below.

1. All hard drives 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.
3. All hard drives to be shredded shall be placed in the Shred-It vehicle using covered and locked bins.
4. Hard drives 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, the unauthorized waste shall be lawfully managed on site 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 the Shred-It vehicle.
2. All shredded hard drives shall be deposited into containers inside the Shred-It vehicle. Once a container is full it shall be closed, locked and secured on the vehicle.

#### **C. Procedures for Storage of Waste**

1. There shall be no storage of shredded hard drive 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 the Shred-It vehicle to the Shred-It New Jersey facility in preparation for shipment to a certified electronics recycler.

### **IV. STORAGE OF PRODUCT:**

- A. Storage of shredded hard drives shall be in Shred-It's vehicle only and shall be stored only for the duration and purpose of immediately transporting the shredded waste to the

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<sup>1</sup> 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 Compliance and Permitting Section at (302) 739-9403.

Shred-It 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 Shred-It 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 Shred-It vehicle for more than twenty-four (24) hours beyond the completion of the final shredding event for that vehicle.

**V. BENEFICIAL USE AND APPLICATION:**

- C. All shredded hard drives 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 Shred-It’s responsibility to ensure that the appropriate recycling permits have been obtained and maintained by the recycler.

**VI. CLOSURE:**

- D. Shred-It shall immediately notify the Department in writing the estimated date of facility closure and/or the date wastes will no longer be accepted.
- E. Shred-It shall notify the Department in writing when closure activities are started, and again when closure is complete.
- F. Should Shred-It cease the shredding of hard drives, all hard drives 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. Shred-It shall maintain its Solid Waste Transporter Permit as long as it is required.
- B. Should Shred-It desire to renew this Permit, Shred-It shall submit a new application no later than 180 days prior to the Permit expiration date. Shred-It may be required to submit additional documentation as needed at the Department’s sole discretion.
- C. This Permit does not relieve Shred-It, 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.

**VIII. PERMIT MODIFICATION AND RENEWAL HISTORY:**

- A. December 2, 2015 Renewal
  - 1. Change in ownership
    - a. From: Cintas Document Management
    - b. To: Shred-It USA, LLC.
  - 2. Expiration date: November 25, 2017.
- B. November 20, 2017 Renewal:
  - 1. Change in permit number format.
  - 2. Added requirement for shredded hard drives to be sent to a certified electronics recycler.
  - 3. Expiration date: November 25, 2020.
- C. August 26, 2019 Modification
  - 1. Update Shred-It Contact Person and associated information
    - a. From: Chris Lavine, District Operations Manager
    - b. To: Cliff Madison, Transportation Supervisor
  - 2. Update Shred-It Alternate Contact Person and associated information
    - a. From: Jonathan Tyler, Facility Manager
    - b. To: George Reisinger, Facility Manager
  - 3. Update due to Division restructuring
    - a. Solid and Hazardous Waste Management Section ("SHWMS")
    - b. Compliance and Permitting Section ("CAPS")
    - c. Associated CAPS contact information
  - 4. Expiration Date
    - a. Unmodified
    - b. November 25, 2020

  
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Jason W. Sunde  
Environmental Program Administrator  
Compliance and Permitting Section

7-26-19  
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Date