



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

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May 3, 2021

Mr. Michael Sirota, Vice President
Guardian Data Destruction, Inc.
30 Wesley St.
South Hackensack, NJ 07606

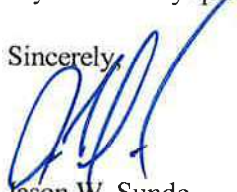
Subject: Recycling Permit #SW-21/03 2021 Renewal
Reference: Guardian Data Destruction, File Code: 02.B

Dear Mr. Sirota:

Enclosed is Recycling Permit #SW-21/03 (Permit) issued by the Compliance and Permitting Section (CAPS). The Permit authorizes Guardian Data Destruction, Inc. (Guardian) to accept and shred computer hard drives and/or media tapes in a Guardian vehicle with shredding equipment for the sole purpose of recycling the shredded waste. This Permit includes updates and incorporates all of the terms and requirements set forth in Guardian's previous Recycling Permit, #SW-17/04, and is granted for a period of five years (5 yrs.) with an expiration date of May 3, 2026.

If you have any questions concerning this Permit, please contact Zack Taylor at (302) 739-9403

Sincerely,


Jason W. Sundt
Environmental Program Administrator
Compliance and Permitting Section

Enclosure

JWS:ZT:jmp
ZT:21028.doc

RECYCLING PERMIT #SW-21/03

Effective Date: May 3, 2021
Expiration Date: May 3, 2026

Facility: Guardian Data Destruction, Inc.
71 Schrieffer Street
South Hackensack, New Jersey 07606

Facility Phone Number: (718) 609-1685

Primary Contact: Michael Sirota, Vice President
(646) 529-6344

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

Location of Approved Activity: State of Delaware
Mobile Shredding Units

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-21/03 ("Permit") to Guardian Data Destruction of South Hackensack, New Jersey ("Guardian") for the purpose of accepting and shredding computer hard drives media tapes in a Guardian vehicle with shredding equipment for the sole purpose of recycling the shredded waste. Guardian's Delaware shredding operations will be performed from, and in, mobile units consisting of box trucks equipped with appropriate shredding equipment.
- B. This Permit shall be conducted in accordance with the conditions herein and with the following documents, as submitted to the Department: (1) Application for Recycling Permit, dated June 4th, 2020, associated documents received through March 2021; (2) Solid Waste Transporter Permit dated January 1st, 2019; and (3) other procedures and policies specifically referenced in this Permit.
1. Conditions of this Permit shall take precedence over any of the above listed documents.
 2. Failure to comply with any condition of this Permit or any provisions within the aforementioned documents is a violation of this Permit.
- C. Permit Availability
Guardian shall immediately make available, upon request, a copy of this Permit to any representative of the Department or any law enforcement officer.
- D. Renewal

Pursuant to DRGSW Section 4.1.6, Guardian shall submit a permit application with all supporting documentation to the Department at least 180 days prior to the expiration of this Permit if applicant desires to renew the Permit. Guardian may be required to submit additional documentation as needed at the Department's sole discretion.

E. Modifications

1. The Department may initiate modification of this Permit, including, but not limited to, additional limitations, requirements, and/or special conditions, at any time if the Department finds that the existing Permit conditions are either not adequate or not necessary to protect human health and the environment, as set forth in DRGSW Section 4.1.7.2, or in the event the regulations governing activities authorized in this Permit are revised.
2. Guardian shall petition the Compliance and Permitting Section of the Department (the "CAPS") in writing at least 90 days prior to the anticipated need to implement any change in waste characteristics; changes that will alter the beneficial use of the incoming waste material; or changes to processes, operations, or procedures described in the application documents referenced in Section I.B. of this Permit. Guardian shall not implement said changes unless and until they have been notified in writing from the CAPS agreeing to the change(s).

F. Permit Transfer

At least 60 days prior to the date of the proposed transfer, Guardian must submit all documentation required by DRGSW Section 4.1.8. The actual transfer will be contingent upon the transferee meeting all Permit and regulatory requirements; until such time, the current permittee will remain liable for compliance regardless of who owns the facility.

G. Revocation or Suspension

This Permit may be revoked or suspended upon violation of any condition of this Permit, DRGSW, or 7 Del. C. Chapter 60.

II. GENERAL OPERATING CONDITIONS

A. Location and Facility

1. The Guardian shredding facilities:
 - a. Consist of box trucks equipped with appropriate shredding equipment;
 - b. Are also referred to herein as "mobile shredding units," "mobile shredding facilities," or "Guardian vehicles." These terms shall have a consistent meaning herein and are utilized interchangeably; and,
 - c. Are mobile shredding units which travel to client locations throughout the State of Delaware.
2. Guardian's operations may be performed at physical locations convenient for and at the direction of Guardian's clients; however,
 - a. Locations shall be selected to comply with all applicable Federal, State, or Local laws, regulations, and/or ordinances, particularly those pertaining to locations where commercial operations may be performed;
 - b. Locations shall be selected with consideration for traffic safety and to minimize impacts to pedestrian and vehicular traffic; and,

- c. Preferably, Guardian's shredding operations will occur on real property owned, leased, or under the legal control of Guardian's client.
3. Guardian vehicles, at a minimum, shall be labeled in accordance with solid waste transporter permit requirements.
4. Pursuant to solid waste transporter permit requirements, Guardian shall notify the Department no less than five (5) days prior to dispatching additional shredding units into the State of Delaware. Notification shall be provided to both the solid waste transporter permit project officer and to the recycling permit project officer.
5. Reserved
6. Guardian operates multiple brick and mortar cross-dock facilities outside of the State of Delaware in surrounding states.
 - a. Hard drives and/or media tapes generated in Delaware and shredded by Guardian shall be delivered to a Guardian cross-dock facility pending ultimate recycling.
 - b. This permit does not regulate operations at Guardian's cross-dock facilities.
- B. Operating Hours

All receiving, processing, and shredding shall be limited to the hours of 8:00 am to 5:00 pm Monday through Friday. Guardian mobile shredding units shall not be open and/or accessible to the general public.
- C. Security and Access

Guardian shall control access to their mobile shredding facilities to prohibit the entry of unauthorized individuals. Representatives of the Department may, at any reasonable time, enter the facility to verify compliance with the conditions of this Permit, the DRGSW, and 7 Del. C. Chapter 60.
- D. Litter
 1. Litter may include any solid waste not approved for processing.
 2. Fugitive feedstock wastes from incoming waste streams and fugitive shredded hard drives and/or media tapes shall be considered and managed as litter.
 3. Guardian shall inspect the immediate area of their shredding facilities for general cleanliness and litter upon arrival at and immediately prior to departure from each service location.
 4. All litter encountered shall be immediately collected, placed in a designated enclosed container, and removed from the mobile shredding facility daily.
 5. Guardian shall implement good housekeeping practices and include such practices in employee trainings, pursuant to Section II.I. of this Permit.
 6. Guardian shall document any complaint received pertaining to litter emanating from their mobile shredding facilities and shall retain the records in accordance with Section IV. of this Permit.
 7. Guardian shall notify the Department of any complaints of litter received by Guardian in accordance with Section V. of this Permit.
- E. Dust Control
 1. Guardian shall operate its facilities in a manner to prevent dust generated from shredding activities to migrate beyond the facility boundaries.
 2. Guardian shall provide adequate ventilation to prevent the ingestion or inhalation of dust from the shredding process.

3. Guardian shall implement dust mitigation practices, as necessary.
4. In accordance with Section IV. of this Permit, Guardian shall maintain detailed records of all dust mitigation practices implemented and of any complaint received pertaining to dust emissions from their mobile shredding facilities.
5. Guardian shall notify the Department of any complaints of dust received by Guardian in accordance with Section V. of this Permit.

F. Noise Control

1. Guardian shall operate its facilities in a manner to prevent noise generated from shredding activities from interfering with any person's enjoyment of life or property.
2. Guardian shall implement noise mitigation, as necessary.
3. Guardian shall document any complaint received pertaining to noise emanating from their mobile shredding facilities and any subsequent noise mitigation practices implemented, and shall retain the records in accordance with Section IV. of this Permit.
4. Guardian shall notify the Department of any complaints of noise received by Guardian in accordance with Section V. of this Permit.

G. Health and Safety, and Contingency

1. Guardian shall implement Health and Safety practices aligned with Occupational Safety and Health Administration ("OSHA") guidance.
2. Guardian shall provide all employees with health and safety training appropriate for each employee's duties and responsibilities, pursuant to Section II.I. of this Permit.
3. At a minimum, Guardian's use of personal protective equipment (PPE) shall be in accordance with 29 CFR Part 1910.132.
4. Guardian shall make first aid equipment immediately available at each mobile shredding facility. The readiness of first aid equipment and supplies shall be periodically assessed and addressed, as conditions dictate.
5. Guardian shall maintain a current and correct list of emergency contact telephone numbers to include nearby ambulance, hospital, police, and fire services. The most current list shall be immediately available in each mobile shredding facility. All operating personnel shall be informed of its location and function.
6. Guardian shall maintain capability to react appropriately to emergencies. Guardian shall react to spills, fires, accidents, and other emergencies so as to protect human health and safety and the environment.
7. Staff responding to emergencies at the facilities shall be appropriately trained, pursuant to Section II.I. of this Permit.
8. Guardian shall document all health and safety training provided to each employee and retain the records in accordance with Section IV. of this Permit.

9. Fire Safety

- a. All wastes and materials present at or in the mobile shredding facilities to include, but not limited to, hard drives and media tapes pending shredding; shredded hard drives and shredded media tapes; any associated or ancillary wastes; and any collected litter shall be managed in order to prevent the possibility of fires.
- b. Flammable or combustible, or potentially flammable or combustible, materials shall be stored in accordance with applicable fire safety regulations.
- c. No smoking shall be permitted in or near the mobile shredding facilities.

- d. Guardian shall develop a fire management plan, which shall be implemented immediately, reviewed annually, and updated as needed.
- e. Employees shall be trained in the proper procedures for responding to a fire at and in a mobile shredding facility in accordance with Section II.I.
- f. Guardian shall maintain fire suppression equipment, such as fire extinguishers, in a fully functional condition, and in accordance with Section II.H.4. of this Permit, as applicable.
- g. If a fire is detected, Guardian shall call 911 to request assistance from the local firefighting agencies. Guardian shall immediately notify the Department of any fire in accordance with Section V.A.2. of this Permit.

H. Equipment

Along with limited manual labor, Guardian will use mechanical equipment to shred hard drives and media tapes.

- 1. The equipment to be utilized for shredding hard drives and media tapes includes, but is not limited to,
 - a. The box trucks at which shredding activities are performed;
 - i. The Guardian vehicle shall be completely enclosed and sealed from external conditions and tampering.
 - b. A variety of PPE, such as steel-toed footwear, safety glasses or goggles, hearing protection, and appropriate gloves;
 - c. Handheld (bar code) scanners to scan, identify, and inventory hard drives and media tapes pending shredding;
 - d. Hard drive shredder to securely destroy hard drives and/or media tapes via shredding; and,
 - e. Locking bins to securely store hard drives and/or media tapes pending shredding and to securely store shredded hard drives and/or shredded media tapes pending recycling.
- 2. Processing and material handling equipment shall be selected and operated in compliance with the Department's Division of Air Quality (DAQ) regulations, as applicable.
- 3. PPE shall be selected and utilized in accordance with Permit Condition II.G.3.

4. Operation, Inspection, and Maintenance

- a. Guardian shall operate, inspect, and maintain all equipment using adequately trained individuals and in accordance with the manufacturer's recommendations; permits; all applicable local, state, and federal ordinances, laws, and regulations; and this Permit.
- b. Guardian shall inspect shredding equipment daily or prior to each shredding event/use.
- c. Guardian shall maintain and operate all equipment in a manner that protects Guardian's employees, the public, and the environment.
- d. Guardian shall document all equipment operation, inspection, and maintenance training provided to each employee as required by Section II.I. and retain the records in accordance with Section IV. of this Permit.
- e. Guardian shall document all inspections and maintenance of all equipment and retain the records in accordance with Section V. of this Permit.

I. Training

1. Guardian shall provide all employees who are to work in the mobile shredding facilities with training appropriate for each employee's duties and responsibilities.
 - a. Training shall be required initially and annually thereafter, unless otherwise specified by a nationally recognized training provider (for example, the American Red Cross as a training provider for First Aid).
 - b. Initial training shall be provided within 180 days of hire.
 - c. Training shall include, but is not limited to, the following topics:
 - i. Health and safety procedures
 - (1) Emergency response
 - (a) Emergency first aid
 - (b) Cardiopulmonary resuscitation (CPR)
 - (c) Fire prevention and protection
 - (d) Spills and accidents responses
 - (2) PPE use and care
 - ii. Shredding operations
 - (1) Proper materials management and shredding procedures
 - (a) Acceptable materials identification
 - (b) Prohibited wastes identification and response
 - (c) Applicable operational aspects of National Association for Information Destruction (NAID) and Responsible Recycling ("R2") Standard for Electronics Recyclers or the e-Stewards® Standard for Responsible Recycling and Reuse of Electronic Equipment® ("e-Stewards®")
 - (2) Facility inspections
 - (3) Equipment operation, inspection, and maintenance
 - (a) Manufacturer's operating and maintenance manual
 - (b) Operation instruction
 - (c) Equipment safety features
 - (d) Hazards that might be encountered
 - (e) To be conducted by the equipment manufacturer's representative or another person specifically knowledgeable in the operation of the equipment
 - (4) Good housekeeping practices
2. Guardian shall document all trainings for employees and retain the records in accordance with Section IV. of this Permit.

III. OPERATIONS

A. Authorized Wastes

1. Guardian may accept only the following wastes for shredding:
 - a. Hard drives; and
 - b. Media tapes; that,
 - c. Prior to acceptance, have been removed from the computer/device; and,

- d. Prior to acceptance, do not contain mercury switches, mercury relays, nickel-cadmium batteries, and/or lithium batteries.
 2. All wastes shall be segregated by the generator (source separated) prior to submittal to Guardian for shredding.
 3. All cases, caddies, or other enclosing material shall be removed from hard drives by the client generator prior to submittal to Guardian for shredding.
 4. All wastes present in the Guardian mobile shredding facilities shall be managed in accordance with this Permit.
- B. Prohibited Wastes
1. Guardian shall not accept prohibited wastes for shredding, as listed in Section III.B.4, below.
 2. Guardian shall exercise reasonable care to ascertain whether incoming waste is or contains prohibited waste. Reasonable care shall include contacting the client generator if a visual determination regarding the acceptability of the waste material cannot be made.
 3. Guardian shall not accept any wastes for shredding from client generators whose waste streams habitually contain prohibited wastes submitted for shredding.
 4. Prohibited wastes for shredding include:
 - a. Hard drives and media tapes containing mercury switches, mercury relays, nickel-cadmium batteries or lithium batteries
 - b. Personal computers, servers, or other electronic components
 - c. Plastics, glass, metal
 - d. Mixed municipal solid waste (trash/garbage) and/or tires
 - e. Construction and demolition wastes
 - f. Organic (food) wastes
 - g. Batteries
 - h. Agricultural wastes
 - i. Petroleum-containing materials or wastes
 - j. Infectious or medical wastes
 - k. Radioactive materials
 - l. Universal wastes
 - m. Hazardous wastes
 - n. Sewage sludge, biosolids, and septage
 - o. Asbestos-containing materials (ACM) and/or wastes
 5. All identified prohibited wastes shall be:
 - a. Segregated from the authorized waste stream, as necessary;
 - b. Quantified, as practical;
 - c. Documented in accordance with Section IV. of this Permit, to include photo documentation, as warranted;
 - d. Rejected for shredding; and,
 - e. Immediately returned to the client generator prior to leaving the site.
 - i. Guardian shall provide the reason for rejection for shredding to the client generator.

- ii. Guardian shall inform the client generator that Guardian is prohibited from accepting any wastes for shredding from client generators who habitually submit prohibited wastes for shredding to Guardian.
- 6. Guardian shall notify the Department of prohibited wastes submitted for shredding pursuant to Section V. of this Permit.
- 7. Assistance with proper handling and disposal of prohibited wastes which were submitted for shredding may be obtained by contacting the following agencies:
 - a. Prohibited wastes a. through g, as listed above:
 - i. Delaware Solid Waste Authority (DSWA)
 - ii. (302) 739-5361 or 1-800-404-7080
 - b. Prohibited wastes h. through m, as listed above:
 - i. CAPS
 - ii. (302) 739-9403
 - c. Prohibited waste n, as listed above:
 - i. Division of Water
 - ii. (302) 739-9946
 - d. Prohibited waste o, as listed above:
 - i. Division of Air Quality (DAQ),
 - ii. (302) 323-4542
- C. Limits on Waste Acceptance
 - 1. Based on the exclusively mobile nature of Guardian's operations in Delaware, waste acceptance limits shall directly correlate with the vehicle chassis manufacturer's specified safe operating weight, defined as the gross vehicle weight rating (GVWR). Guardian shall not accept or transport wastes, either authorized or prohibited, at any time, that cause or contribute to a Guardian mobile shredding unit exceeding the manufacturer's specified GVWR for that specific vehicle.
 - 2. The maximum weight limit for each Guardian vehicle, in accordance with specifications outlined in Guardian's Plan of Operation, shall be:
 - a. Truck S-112: GVWR 52,000 lbs.
 - b. Truck S-114: GVWR 33,000 lbs.
 - c. Truck S-109: GVWR 33,000 lbs.
- D. Procedures for Waste Acceptance
 - 1. Guardian shall quantify and record the quantity of all incoming wastes, any rejected and/or prohibited wastes submitted for shredding, and all out-going wastes; to include shredded hard drives and media tapes; for each mobile shredding facility.
 - a. Operations shall be executed in accordance with 21 Del. C., Chapter 45.
 - b. Guardian shall notify the CAPS in the event wastes accepted in Delaware cause or contribute, in any way, to a Guardian mobile shredding unit exceeding the manufacturer's specified GVWR, in accordance with Section V.A. of this Permit.
 - 2. Guardian shall inspect all incoming loads or bins of waste hard drives and/or media tapes submitted for shredding for prohibited waste items listed in Section II.B.4. prior to any shredding activities.
 - a. Identified prohibited wastes submitted for shredding shall be managed in accordance with Sections III.B.5. through III.B.7, as applicable.

3. All hard drives and media tapes submitted to Guardian by a client generator for shredding and meeting the criteria for authorized wastes stipulated in Section III.A. shall be transferred to a Guardian mobile shredding facility in secured enclosed containers.
 4. Hard drive and media tape wastes shall only be transferred back to the client in the event of a security breach.
- E. Procedures for Processing of Waste
1. Only authorized wastes as specified in Section III.A. shall be processed (shredded); any additional wastes shall not be processed.
 2. All waste processing shall be performed at or in a Guardian mobile shredding facility.
 3. Shredding equipment shall be inspected for operational safety prior to each shredding event. Inspections and maintenance shall be documented pursuant to Section IV. of this Permit.
 4. All shredded hard drives and/or media tapes shall remain segregated and shall be deposited into designated, secured, and enclosed containers inside the Guardian mobile shredding facility.
 5. Once a container of shredded hard drives and/or media tapes is full, the container shall be physically secured within and to the Guardian vehicle to restrict movement and facilitate safe transportation.
- F. Procedures for Storage of Waste
1. Shredded hard drives and/or media tapes shall not be stored at the client generator location.
 2. Storage of shredded hard drive waste and/or shredded media tape waste shall be only within in the Guardian mobile shredding facility.
 3. At the conclusion of an on-site shredding event, all containers of shredded hard drive waste and/or shredded media tape waste shall be promptly transported in the Guardian vehicle to a Guardian cross-dock facility or directly to a R2, e-Stewards, or equivalent certified electronics recycler.
 4. Storage of shredded hard drive waste and/or shredded media tape waste shall be stored only for the duration and purpose of immediately transporting the shredded waste to a Guardian cross-dock facility.
 5. The duration of storage of shredded hard drive waste and/or shredded media tape waste, within the Guardian mobile shredding facility shall not exceed 24 hours from the conclusion of the shredding event and while in Delaware, except as stipulated in Sections III.F.5.a. through III.F.5.c. of this Permit.
 - a. The duration of storage of shredded hard drive waste and/or shredded media tape waste, may be extended if an already scheduled, consecutive shredding event is necessary to fill the vehicle to or near capacity.
 - b. In the event that previously scheduled, consecutive, and additional shredding events are necessary to fill the Guardian mobile shredding facility to or near capacity, shredded waste shall not be stored in the Guardian vehicle for more than 24 hours beyond the completion of the final previously scheduled, additional and consecutive shredding event for that individual Guardian vehicle.

- c. Under no circumstance shall any wastes be stored within the Guardian mobile shredding unit for more than 48 hours.
 6. Guardian shall segregate all shredded hard drive, media tape, and/or associated wastes from any and all other electronic wastes collected for recycling.
 7. The quantity of electronic wastes, supplemental to the shredded hard drive, media tapes, and/or associated wastes, shall not exceed the mobile shredding unit's GVWR.
- G. Disposition Procedures
1. The date, quantity, and a description of all wastes transferred from each Guardian mobile shredding facility to a Guardian cross-dock facility (or any other receiving facility) shall be recorded in accordance with Section IV. of this Permit.
 2. All shredded hard drives and media tapes shall be sent to a certified electronics recycler approved to accept such waste.
 - a. The electronics recycler shall obtain certification via an accredited, independent, third-party auditor, such as is obtained via R2 or e-Stewards®.
 - b. It is the responsibility of Guardian to ensure that the appropriate recycling permits have been obtained and are maintained by the recycler.
 3. All ancillary or additional wastes shall be lawfully managed and disposed in accordance with all applicable local, state, and federal ordinances, laws, and regulations.
 4. The date, quantity, and location of ultimate disposal of all wastes shall be documented in accordance with Section IV. of this Permit.

IV. RECORDKEEPING

- A. Guardian shall record the information required by Section IV.B. of this Permit.
1. The applicable records for each shredding event, or for consecutive shredding events, shall be maintained in each individual Guardian mobile shredding facility until the shredded waste hard drives and/or shredded waste media tapes are transferred to a Guardian cross-dock facility or directly to an approved electronics recycler.
 2. The records shall thereafter be maintained on-site at Guardian's South Hackensack, New Jersey facility for a period of no less than three years (3 yrs.).
 3. The records shall be made immediately available to the Department for review upon request.
 4. Historical records maintained at the South Hackensack, New Jersey Guardian facility shall be made available to the Department for review within 24 hours of request or the following business day.
- B. Guardian shall maintain the following records:
1. Quantity of hard drives accepted from each of Guardian client, for each shredding event and location.
 2. Quantity of media tapes accepted from each of Guardian client, for each shredding event and location.
 3. Quantity of shredded hard drives transferred to , a Guardian cross-dock facility for each client generator, shredding event, and location.
 4. Quantity of shredded media tapes transferred to a Guardian cross-dock for each client generator, shredding event, and location.

5. Bills of lading for shipment of shredded hard drives for ultimate or final recycling.
6. Bills of lading for shipment of shredded media tapes for ultimate or final recycling.
7. Reports from all ultimate or final recycling facilities utilized including quantity of the recycled shredded hard drives and Certificate of Recycling, or equivalent documentation.
8. Reports from all ultimate or final recycling facilities utilized including quantity of the recycled shredded media tapes and Certificate of Recycling, or equivalent documentation.
9. Information pertaining to prohibited wastes submitted for shredding and rejected loads to include volume, weight, or quantity of prohibited wastes/rejected loads; date of (attempted) delivery and/or rejection; client generator; the reason for rejection; type of prohibited waste; and any supplemental documentation required due to type of prohibited waste.
10. Quantity of associated and/or ancillary wastes and/or litter sent for disposal, recycling, or reuse, and the date and facility where sent.
11. Quantities, descriptions, and documentation of ultimate disposition for other electronic wastes generated in and collected from Delaware in order to facilitate reporting under Delaware's Universal Recycling Law, as referenced in Section V.C.2.
 - a. In this instance, the term "other electronic wastes" refers to electronic items collected by Guardian for the purpose of recycling, but are not hard drives or media tapes, nor shredded or intended for mobile shredding.
 - b. The collection of other electronic wastes for the purpose of transportation to a Guardian cross-dock facility outside of the State of Delaware to await final recycling is not regulated by this Permit.
12. Any litter, noise, or dust complaints received by Guardian concerning a mobile shredding facility.
13. All litter, noise, or dust mitigation activities implemented, to include date and time of implementation, method of mitigation, and any contracted mitigation services.
14. Any lease modifications with the potential to cause changes to facility operations, lease violations, and lease terminations.
15. All training provided to employees.
16. All operational inspections, and all equipment inspections and maintenance.
17. Information sufficient to meet the requirements of Section V. of this Permit for all incidents and emergencies.
18. Information pertaining to all notifications made to CAPS or incidents requiring notification pursuant to Section V.A. of this Permit, whether notification was made as required or not.
19. Detailed descriptions of all instances, whether intentional or accidental, of deviations from or noncompliance with a parallel or analogous recycling or solid waste facility permit for any of Guardian's facilities outside of the State of Delaware that are used to support Guardian's mobile operations in Delaware.
20. Detailed descriptions of all instances, whether intentional or accidental, of deviations from or noncompliance with this Permit.

V. NOTIFICATION AND REPORTING

A. Incidental Notification and Reporting

Guardian shall notify CAPS of all incidents and emergencies.

1. Guardian shall take immediate reasonable action to correct or remedy all incidents and emergencies in order to ensure human health and protect the environment.

2. Emergency Incidents

Guardian shall immediately notify the CAPS by telephone at (302) 739-9403 [or, if after business hours (8:00 am to 4:30 pm, Monday through Friday), the Environmental Emergency toll-free hotline at 1-800-662-8802] in the event of:

- a. An emergency including, but not limited to, fire, explosion, spill, release, vehicle/equipment accident resulting in personal injury, injury requiring hospitalization, and employee occupational exposure.
- b. Receipt of the following prohibited wastes:
 - i. Infectious/medical wastes including sharps;
 - ii. Radioactive materials; and,
 - iii. Hazardous wastes.
- c. In the event that notification is made after the Department's normal business hours to the Environmental Emergency toll-free hotline, Guardian shall contact the CAPS by telephone at the telephone number provided above within 24 hours of the emergency incident, or the following business day, to confirm notification.

3. Non-Emergency Incidents

Guardian shall notify the CAPS by telephone at (302) 739-9403 or by e-mail within 24 hours or the following business day in the event of:

- a. Complaints pertaining to litter, dust, or noise emanating from the Guardian facility.
 - b. Receipt of the following prohibited wastes:
 - i. Sewage sludge, biosolids, and septage;
 - ii. Petroleum-containing materials and/or wastes;
 - iii. Universal wastes;
 - iv. Agricultural wastes; and,
 - v. Asbestos-containing materials (ACM) and/or wastes.
 - c. Facility changes including, but not limited to, changes in the company ownership, company name, company officials, management staff, and operators.
 - d. Lease termination, all lease violations, and any lease modification with the potential to cause changes to facility operations
 - e. Any exceedance of any limit established herein.
 - f. Any failure to comply with any condition of the parallel or analogous solid waste or recycling facility permits associated with Guardian's facilities outside of the State of Delaware that are used to support Guardian's mobile operations in Delaware.
 - g. Any failure to comply with any condition of this Permit.
4. Guardian shall submit a detailed written notification by either e-mail or hardcopy to be received by the CAPS no later than five (5) business days following any incident,

emergency or otherwise, as listed in Sections V.A.2. and V.A.3. of this Permit. The notification shall include the following:

- a. Date and time of occurrence/discovery.
- b. Date and time reported to the Department. Include a reference number if reported to the Environmental Emergency hotline.
- c. For spills or releases; materials, quantities, and area involved.
- d. A sketch of the scene of the incident, showing location and approximate dimensions.
- e. List of agencies notified.
- f. For a prohibited waste, the generator and corresponding contact information.
- g. Narrative describing how the incident occurred and actions taken by Guardian and other response personnel, as applicable, to remedy the situation.
- h. Report of injuries and/or damage.
- i. In the event of a complaint, name, address, and phone number of the person making the complaint, as well as the content of the complaint.
- j. Proposal for remedial or corrective actions including a schedule for implementation.
- k. Any additional information seemingly relevant or material to the incident.

B. Quarterly Reporting

Guardian shall submit quarterly reports to the CAPS via e-mail no later than the 15th day of the month following the end of the quarter (1st quarter report is due by April 15th, 2nd quarter report is due by July 15th, 3rd quarter report is due by October 15th, and 4th quarter report is due by January 15th). The quarterly reports shall summarize operations for the previous quarter and include the following information for the applicable quarter (information shall be presented in a tabular format, as appropriate, and each listed item shall be explicitly addressed to include zero quantities or currently not applicable topics):

1. The quantity of hard drives accepted from each client, listed by date and shredding event location.
2. The quantity of media tapes accepted from each client, listed by date and shredding event location.
3. The quantity of shredded hard drives sent for ultimate or final recycling, listed by client, shredding event location, and ultimate or final recycling facility.
4. The quantity of shredded media tapes sent for recycling, listed by client, shredding event location, and ultimate or final recycling facility.
5. Reports from all ultimate or final recycling facilities including quantity of the shredded hard drives that were recycled and associated Certificate of Recycling, or equivalent documentation.
6. Reports from all ultimate or final recycling facilities including quantity of the shredded media tapes that was recycled and associated Certificate of Recycling, or equivalent documentation.
7. For each occurrence, quantity of any prohibited wastes submitted (or attempted to be submitted) and/or number of rejected containers of waste, to include the type of prohibited waste and/or reason for rejection, submittal date (or attempted submittal date) and or date of rejection, client generator name, disposition of prohibited waste and/or rejected container, and date of disposition.

8. Quantity of associated and/or ancillary wastes and/or litter sent for disposal, recycling, or reuse, and the date and facility where sent.
9. Summary of all notifications made to CAPS or incidents requiring notification pursuant to Section V.A. of this Permit, whether notification was made as required or not.
10. Detailed descriptions of all instances, whether intentional or accidental, of deviations from or noncompliance with the applicable parallel or analogous solid waste or recycling facility permit associated with Guardian's facilities outside of the State of Delaware that are used to support Guardian's mobile operations in Delaware.
11. Detailed descriptions of all instances, whether intentional or accidental, of deviations from or noncompliance with this Permit.

C. Annual Reporting

1. Annual Recycling Facility Report

No later than February 1st of every year, Guardian shall submit an annual report to the CAPS. This annual report shall summarize operations for the previous calendar year and include the following information (information shall be presented in a tabular format, as appropriate, and each listed item shall be explicitly addressed to include zero quantities or currently not applicable topics):

- a. The total annual quantity of hard drives accepted from each client, listed by shredding event location.
- b. The total annual quantity of media tapes accepted from each client, listed by shredding event location.
- c. The total annual quantity of shredded hard drives sent for ultimate or final recycling, listed by ultimate or final recycling facility.
- d. The total annual quantity of shredded media tapes sent for ultimate or final recycling, listed by ultimate or final recycling facility.
- e. The total annual quantity of any prohibited wastes submitted (or attempted to be submitted) and/or number of rejected containers of waste, to include the type of prohibited waste and/or reason for rejection and the client generator name.
- f. Total annual volume of associated or ancillary wastes and/or litter sent for disposal, recycling, or reuse to each disposal location utilized.
- g. A summary of all emergencies and incidents that occurred at the facility during the year.
- h. A summary of all instances, whether intentional or accidental, of deviations from or noncompliance with the applicable parallel or analogous solid waste or recycling facility permit associated with Guardian's facilities outside of the State of Delaware that are used to support Guardian's mobile operations in Delaware.
- i. A summary of all instances, whether intentional or accidental, of deviations from or noncompliance with this Permit.
- j. Documentation that all recycling facilities used in accordance with this Permit are current certified electronics recyclers.

D. Written notifications and reports shall be submitted via e-mail to Zachary.Taylor@Delaware.gov.

VI. CLOSURE

- A. Guardian shall immediately notify the Department in writing of the estimated date that mobile shredding operations are planned to cease.
- B. Should Guardian cease the shredding of hard drives and media tapes; all hard drives and media tapes, shredded or otherwise, shall be properly disposed of or recycled.
- C. By the cessation date provided by Guardian, Guardian shall remove from the State of Delaware all waste hard drives, all waste media tapes, all shredded hard drives, all shredded media tapes, all associated and/or ancillary wastes, all collected litter, any additional electronic wastes, and all mobile shredding facilities.
- D. All disposal and recycling activities undertaken pursuant to Section VI. of the Permit shall be conducted pursuant the requirements of the applicable permit at the time of closure, including any closure permit; DRGSW; and the Delaware Code.

VII. ADDITIONAL CONDITIONS

- A. Guardian shall maintain its State of Delaware Solid Waste Transporter Permit as long as is required.
- B. This Permit does not relieve Guardian, nor any of its client generators, from complying with any other applicable federal, state, or local laws, regulations or ordinances.
- C. 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.
- D. Any violation of any regulatory law, regulation, or ordinance for Guardian's facilities outside of the State of Delaware that are used to support Guardian's mobile operations in Delaware shall justify termination of this Permit.

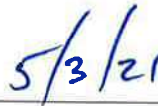
VIII. PERMIT MODIFICATION AND RENEWAL HISTORY

- A. November 2, 2015
 - 1. Renewed BUD #43/111517 without modification.
 - a. Expiration date: November 15/2017
- B. November 13, 2017
 - 1. Transitioned Beneficial Use Determination Approval (BUD) #43/111517 to Recycling Permit #SW-17/04.
 - a. Expiration date: November 15, 2020
 - 2. Added requirement for shredded hard drives and media tapes to be sent to a certified electronics recycler.
- C. November 4, 2020
 - 1. Permit administratively extended to March 31, 2021 to provide adequate time for permit renewal.
- D. March 11, 2021
 - 1. Permit administratively extended to May 31, 2021 to provide adequate time for permit renewal.
- E. May 3, 2021

1. Recycling Permit #SW-17/04 transitioned to #SW-21/03.
 - a. Expiration date: May 3, 2026
2. Permit conditions updated, expounded, and modified
 - a. Conditions from the previous recycling permit were expounded upon.
 - b. Necessary updates to dates and contact information.
 - c. Waste acceptance limits modified to directly correlate with specific vehicle GVWR, and those limits are now defined in Section III.C.
 - d. Quarterly and annual reporting requirements expanded to include descriptions for instances of non-compliance, emergencies, quantities of ancillary wastes, and annual proof that recycling outlets for Guardian are certified in accordance with this permit.
 - e. Recordkeeping requirements expanded.



Jason W. Sunde
Environmental Program Administrator
Compliance and Permitting Section



Date

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