E-WORLD ONLINE

*Manufacturers Interstate Takeback System*

# Takeback Program for Recycling Covered Electronic Devices in Oklahoma

Program Year: January 1, 2012 to December 31, 2012

**Submitted to:**
Oklahoma Department of Environmental Quality
Land Protection Division
PO Box 1677
Oklahoma City, OK 73101-1677
General Phone Number: 405-702-5100

**Date of application:**
March 1, 2012

**Representative for the plan is:**
MITS
2480 Ash Street
Vista, CA 92081
(760) 599-0888
info@MITSecycle.com

**The following Manufacturers are covered by this plan, referred to as 'members':**

- Sony Electronics Inc
- KCPI/Affinity
- Pantech Wireless, Inc.
- Envision
- NEC
- Craig Electronics, Inc.

## The Description of MITS as "The Administrator" of this Plan

The MITS program was founded by veterans in the electronic recycling field and developed with one objective in mind:

"To provide the premium administrative recycling solution for manufacturers of Electronics throughout the United States."

Following the launch of the program in early 2009, MITS has quickly exceeded its objective. To date, the MITS program has secured strong relationships with 12 of the world's leading electronic manufacturers in every state. In 2010 the MITS program was responsible for the processing of approximately 20 million pounds of electronic waste. In 2012 the program will process over 60 million pounds.

MITS prides itself on working with R2 certified recyclers, facilitating convenient customer solutions and providing the best possible service to OEM clients.

## Scope and Intent of this Plan:

Implementation of this plan will provide a program that will:

1) Define the methods that will be used to collect CED's and VDD's.
***CED's and VDD's or Covered Electronic Devices covered under this plan include: a desktop or personal computer, computer monitor, portable computer, or television sold to a consumer and small business.***

2) Explain the processes and methods that will be used to recycle recovered used CED's and VDD's including a description of the recycling processes that will be used, with names and location of all authorized recyclers to be directly utilized by the plan.

3) Describe the means that will be utilized to publicize the collection services, including specification of a website or toll-free telephone number that provides information about the MITS recycling program in sufficient detail to allow consumers to learn how to return their used televisions for recycling (including limitations placed by collection sites on the number of used CED's and VDD's permitted for drop-off by consumers and small businesses).

4) Describe the intention of the registrant to fulfill its obligation through its own operations, either individually or with other registered manufacturers.

5) The electronic manufacturers listed will not provide collection or recycling services to business entities under a vendor-to-business purchaser recycling agreement.

6) An explanation of what entities will finance the collection of the CED's and VDD's.

7) Demonstrate the quality of recyclers and transporters being utilized for this plan. (R2 certification explanation)

**Operational Details:**

The MITS Program will utilize several methods of collection and 1 recycler in order to maximize drop off convenience for Oklahoma residents.

Collection locations will not accept any electronic device which does not qualify as a CED under Oklahoma Regulation.

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No collected covered device will be disposed of in landfills or be transferred to a recycling center that disposes of covered devices in landfills. All covered devices collected shall be recovered in compliance with all applicable federal, State, and local Laws.

Consumers who may not be physically able to bring CED's and VDD's to collection sites have the option to utilize the mail back program detailed in the plan. Please see description to be inserted below, which are on the www.e-worldonline.com website.

E-World Online's Mail Back Program Description

1. An option via a "mail back program" # 1: Administered by MITS at no cost to the consumer. This mail back system will be available by accessing www.e-worldrecyclers.com. In order to utilize the mail back program each consumer may access the websites/links listed above or call E-World Online (MITS) office directly. Once they do so and the product has been validated, the consumer will be mailed or emailed (per request) a pre-paid shipping label and instructions on how to render the unwanted product to a convenient UPS location. The closest UPS location will be provided in the instructions. The mail back program is intended for products weighing less than 50 lbs.

2. An option via "mail back program" # 2: In cases in which the consumer or small business does not wish to utilize the convenient drop off locations provided in option #1, the customer may choose option #2. This mail back alternative is available by accessing www.e-worldonline.com or calling E-World Online (MITS) with the toll free number listed.

If the customer deems that the drop off option to a UPS Store is not convenient, they may contact E-World Online via phone or email in order to have their qualified device picked up at no charge. The pick-up process will operate in the following steps:

A. Customer contacts E-World Online via email or phone to provide the specifications of the electronic including name, address, contact information, dimensions, approximate weight, category, and desired date of pick up.
B. Once E-World has determined the electronic device qualified as a CED, it will send a box with a UPS or FedEx code tag to the address given.
C. The customer will receive the box, pack it with the electronic, apply to code tag, notify E-World Online the package is ready for pick up, and leave it at their door.
D. UPS or FedEx will be notified immediately by E-World Online in order to pick up the package immediately.

Customer instructions detailing the mail back program will be posted on the websites listed above as follows (You may access www.e-worldonline.com and click on the "Recycle an Item" tab on the homepage to access:

MITS takes confusion out of recycling your old electronic items and provides you with a simple step-by-step approach that clearly explains all the available solutions. In many cases the solution is completely free of charge to you; it is paid for by the manufacturers. The step by step recycling wizard will explain any responsibility required by you in the recycling process. Here is how MITS is able to make the whole electronics recycling process as easy and convenient as possible:

1. By entering the location on the website you wish to search from, MITS will search for any nearby recyclers that will accept your electronic device. Based on your location the type of recyclable items may change. In addition to a list of recyclers, information about each location will also be provided: address, phone number, hours, products accepted, applicable fees, etc.
2. Next you will be asked several questions about the product you wish to recycle: the type of electronic device (computer, laptop, television, etc.) and the manufacturer, or brand, of the item.
3. If there is not a convenient electronics recycler near you, MITS can determine if your electronic item is eligible for a mail-back option through the product's manufacturer. This is when participating manufacturers provide a service for their customers to mail-back the product they wish to recycle to a trusted electronics recycler.
4. To determine mail-back eligibility, you will be asked to enter the item model number and size (width, height, depth, and weight). This allows MITS to determine if the product meets the manufacturer's mail-back program criteria, such as weight and size eligibility requirements
5. If MITS determines your product is eligible for the manufacturer's mail-back program, you will be asked to enter some information about you so we may assist you

further in the process. By entering your name, address, phone number, and email address, MITS will be able to email you a shipping label for your item and provide step-by-step instructions on what to do next. You will also be informed as to whether the mail-back item will be completely paid for by the manufacturer, or if there is an applicable fee to have your electronic item recycled.

6. To begin the steps towards recycling your electronic item, click here. .. Thank you for allowing us to assist you!

**Financing:**

MITS members have budgeted monies for compliance under this regulation. MITS members, certifying their intent to comply with the Oklahoma law under this plan, have an enforceable contract in place with E-World Online, the contractor administering the operational aspects of this plan. Term of the MITS member contracts with E-World Online will be in effect prior to October 1, 2011 and will remain in effect indefinitely unless parties to the contract exercise the option to terminate. All vendors utilized by the MITS program will maintain service contracts with enforceable provisions with the administrator, E-World Online. Collection and recycling are free of charge when material is collected and recycled under the guidelines of this plan.

**Management:**

MITS members may inspect the recycling facilities operated by service providers and their subcontractors. It is noted that processors certified under R2 shall be considered acceptable without inspection; however does not preclude the rights of MITS members to conduct onsite inspection. It is noted that processors certified under R2 shall be considered acceptable without inspection; however does not preclude the rights of MITS members to conduct onsite inspection. Inspection will cover compliance with the required elements including documentation review of receiving, shipping, processing, payments to subcontractors, and training, as well as service providers' ability to meet the required elements of the Oklahoma law. Additionally, audit elements will include downstream management and prevention of prison labor being used as well as non-export of material deemed hazardous waste per Basel Treaty. See section regarding 'environmentally sound recycling practices' below for more details.

Collection sites shall be staffed and open to the public at a frequency adequate to meet the needs of the area being served. The program may be augmented by conducting collection events as needed.

**Education & Outreach:**

The plan will provide for advertising and promotion of collection opportunities statewide. Promotion of the collection opportunities will be conducted using the internet and any other outlets the group sees fit to communicate such information. Addresses for internet search engine based on address and zip code will be provided. All events will be promoted with local media being informed in advance of such event, with name and location provided. Also – we can commit to providing plan information and updates to MI for their own dissemination.

**Transportation:**

Plan covers the transportation needs of CED's and VDD's.

**Environmentally-sound management practices:**

Every entity involved in the MITS collection program, including collector, transporter, and authorized recycler shall, at a minimum, demonstrate compliance with the United States Environmental Protection Agency's **Plug-In to eCycling Guidelines** for Materials Management as issued and available on the United States Environmental Protection Agency's Internet website in addition to any other requirements mandated by federal or State law.

**Implementation timeline:**

Program officially to start January 1, 2012. The goal of program is to meet or exceed the obligations set forth by the state.
Key dates:
Submission of MITS plan: February 24, 2012
Implementation of plan: January 1, 2012
Evaluation of progress: ongoing (volume, active collectors, non-active collectors, compliance with instructions, payments, and other elements necessary to track progress)

**Convenient Collection sites and services:**

Collection systems are designed with user convenience and availability in mind. This plan provides for convenient service throughout the state. Each specific collection site or service meets the needs of the identified market, and also meets, at a minimum, environmentally sound management practices for collection sites.

Collection sites are staffed in a manner that can ensure that incoming materials are screened for CED's and VDD's from covered entities and for site security.

**Please feel free to contact the MITS office at any time with questions or concerns.**

**Michael Ritchie**
**Director**
**(760) 599-0888**
**michael.ritchie@eworldrecyclers.com**

## Recycler:

Natural Evolution, Inc.
5719 East 13th Street
Tulsa, OK 74112

***Collection Sites***
Through its current network of relationships with current clients and community members in Oklahoma, NATURAL EVOLUTION is able to provide a selection of collection sites in each county. Collection site locations may be added or changed in the future.

***Collection Method***
Collection containers will be provided to each collection site. Initially, these collection containers will be Gaylord's. As the program grows, the quantity and type of collection containers can be modified based on the needs of the local communities. Appropriate signage and instructions for participants in the program should be discussed The scheduling of pick-ups at each location will be determined with each individual location, as NATURAL EVOLUTION maintains open communications with each of its clients.

***Processing of Materials***
Collected Electronic Waste will be transported to and consolidated at a NATURAL EVOLUTION location at 5719 East 13th Street, Tulsa, OK, 74112. NATURAL EVOLUTION will utilize its own trucks to transport all equipment to a NATURAL EVOLUTION site.

NATURAL EVOLUTION maintains clean green recycling processes. We operate under Federal, State and local laws and maintain all applicable permits and closure and post closure bonds. We attempt to reuse all equipment when possible as a first course of action. All equipment for resale is tested and graded before it is sold. If the equipment is not reusable, it is de-manufactured into commodities for recycling. All R2 Focus Materials are handled with extreme care throughout the recycling chain. We do qualify and audit our downstream vendors who process R2 Focus Materials. Additional details may be found in the attached "NATURAL

EVOLUTION's Position on Operating Principles and Best Practices" and "Recycling Process Description."

***REPORTING***

NATURAL EVOLUTION will report its collected weights from each location in the provided software program on a monthly basis. NATURAL EVOLUTION provides inbound / outbound logs to the Department of Environmental Protection, documenting the type of waste stream, by customer, and total weights.

***Marketing and Public Outreach***

NATURAL EVOLUTION would make program information available on its own website, as well as providing supporting organizations with information to make available to their communities. Easily recognizable signage would be located on collection containers and or collection locations, as appropriate for the individual organization. In addition to having literature available at each collection point, information would be made available at municipalities, county offices, environmental organizations and member organizations that service the community.

Consumers will have the option of contacting NATURAL EVOLUTION directly for program details. Methods of contact for consumers are calling NATURAL EVOLUTION at704-376-1116 or visiting a local facility.

Facility address and contact information in which the CED's and VDD's will be processed:

Natural Evolution, Inc.
5719 East 13th Street
Tulsa, OK 74112

2011 Recycling Results:

| State | Affiliate | Product | Amount |
|---|---|---|---|
| Oklahoma | NEC Display Solutions | Computer | 500.00 |
| Oklahoma | Sony Electronics | Computer | 141590.00 |
| Oklahoma | Sony Electronics | Monitors | 143309.00 |
| Oklahoma | Sony Electronics | Peripherals | 115101.00 |