



VESCO CLEAN ENERGY

Battery Management



2026

Headquarters

📍 16055 West 12 Mile Road
Southfield, MI 48075

📞 Main: (800)527-5358

Office: (248)557-1600

Fax: (248)557-2236



vescoenergy.com

6302025.2-F InfoPacket - 2026.2.pdf
Effective Date: 04-27-26

President & CEO: Lilly Epstein Stotland

CFO: Ryan Joseph

Director of HR: Kate Schamanek

Director of Supply Chain and Logistics: Stephanie Dix

Program and Business Development Manager: Jeff Batalucco

Operations Manager: Adam Hancock

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Business Reference Information

Employer Identification Number	33-3328291
Dun and Bradstreet Number	11-948-1105
NAICS	423930
SIC CODE	5093

Facilities Utilized by Clean Energy

01

4935 Starr St SE, Grand Rapids, MI
(Sortation & Storage)

Facility Data

Size of Facility	53,325 sq. ft.
Space Utilized (by CE)	20,000 sq. ft.
Size of Site Lot	4.02 acres
Average Employee Count	18
Inbound Capacity (pounds)	480,000/month

Compliance

US-DOT

NUMBER

EXP.

US-DOT: Special Permit Authorization	SP 16532	March 3, 2027
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US-EPA

Site ID#	Address	City, State
MIK140987005	4935 Starr St SE	Grand Rapids, MI

MI-EPA (EGLE)

No Exposure Stormwater #	Address	City, State	EXP.
NEC187645 v1.0	4935 Starr St SE	Grand Rapids, MI	June 9, 2030

Certifications

Certificate # / Type	Address	City, State	EXP.
CO879901-R21 / R2v3	4935 Starr St SE	Grand Rapids, MI	April 23, 2029
CO879901-R11 / RIOS:2016	4935 Starr St SE	Grand Rapids, MI	April 23, 2029

Compliance & Certifications

Direct links to Compliance (here) & Certifications (here)

About Vesco Clean Energy

- Founded in 2024.
- Provides Battery Management Services.
- R2 and RIOS Certifications (Work in progress).
- Headquartered in Southfield, MI.
- Located in the Midwest.

There is an ever-growing battery market that requires end-of-life handling and recycling. With the newly entering stewardships and mandates, battery management solutions are limited within the circular economy. Our goal is to provide safe and reliable solutions in response to continuous growth while meeting or exceeding regulatory and customer requirements. We are at the forefront of sustainability.

Equal Opportunity

Vesco is committed to providing equal opportunity in employment and to prohibiting all forms of unlawful discrimination and harassment. All employment decisions, policies and practices will comply with applicable federal, state and local anti-discrimination laws. In addition, Vesco continues to seek out, employ, promote and compensate based on ability, as demonstrated by performance, qualified individuals of all racial groups, religions, ages and national origins, without regard to gender, marital status, disability or any other legally protected status.

Further, Vesco provides to qualified individuals with disabilities, of which Vesco is aware, reasonable accommodations, which do not impose an undue hardship on Vesco or jeopardize the safety of other employees or our customers or suppliers. With regard to an

Employee's religious observances, practices and beliefs, of which Vesco is aware, Vesco endeavors to provide reasonable accommodations, which do not impose an undue hardship on Vesco.

Our Mission

At Vesco Clean Energy, our mission is to responsibly manage end-of-life batteries, ensuring full compliance with environmental regulations while delivering exceptional service to our customers. We are committed to safe, sustainable recycling practices that protect communities, support the circular economy, and exceed industry standards in transparency, traceability, and environmental stewardship.

Core Beliefs

The following are the key philosophies of our Company:

- We believe in protecting the environment.
- We prioritize the safety of our stakeholders; employees, partners, and communities.
- We believe our customers deserve responsive, reliable service and transparent processes that meet their compliance and sustainability goals.
- We build long-term relationships based on trust, open communication, and shared commitment to a cleaner, safer future.

Corporate Insurance

General Liability	\$2M per occurrence, \$4M aggregate
Umbrella Liability	\$3M per occurrence, \$3M aggregate
Automotive Liability	\$5M per occurrence
Professional Liability	\$1M per occurrence, \$3M aggregate
Pollution Liability	\$2M per occurrence, \$3M aggregate
Workers Compensation	Statutory

Services

Battery Collection & Management

- Transparent, traceable, and responsible custom battery collection and management programs that allow our partners to easily track their sustainability goals while increasing safety at their facilities.
- Experienced team who can assist with shipping, identification, labeling, storage, and safety questions regarding all aspects of end-of-life battery management for any battery chemistry.
- Turnkey shipping solutions anywhere in North America.
- White glove, on-site service quotes available upon request.
- Damaged battery packaging and transport options available for DDR (Damaged, Defective, Recalled) batteries of any size.

All Format Battery Collection

- Easily recycle all sizes and chemistries of batteries.
- Transparent collection reporting to allow customers to accurately track their sustainability goals.
- Proper packaging, labeling, and instructions provided.
- Haz trained Vesco drivers swap out full collection bins for empty as needed.
- Certificate of reclamation available upon request.
- Battery recycling keeps batteries out of landfills and facilities safer.
- Competitive pricing compared to similar mail-back and collection programs.

Transport

- Scheduling and managing the appropriate carriers.
- Providing the correct packaging that meets regulatory and safety standards.
- Packaging instructions and assistance.
- Vesco's fleet can provide prompt service to current customers aligning with their current delivery schedule.
- Ability to ship throughout North America, including Canada. *
- White glove packing and pick up quote available upon request.

Storage

- Vesco can offer fully managed storage from first pick-up to the final destination.
- Safely store your battery materials with flexible storage options.
- White glove packing-repacking quotes available upon request.

 VESCO CLEAN ENERGY	QEHSMS Manual	Effective Date: 05-07-25
SUBJECT: Health and Safety Manual	Rev: 1.0 Page: 1 of 57	

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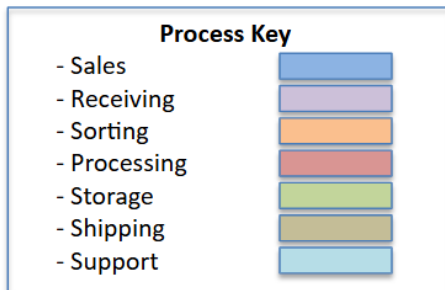
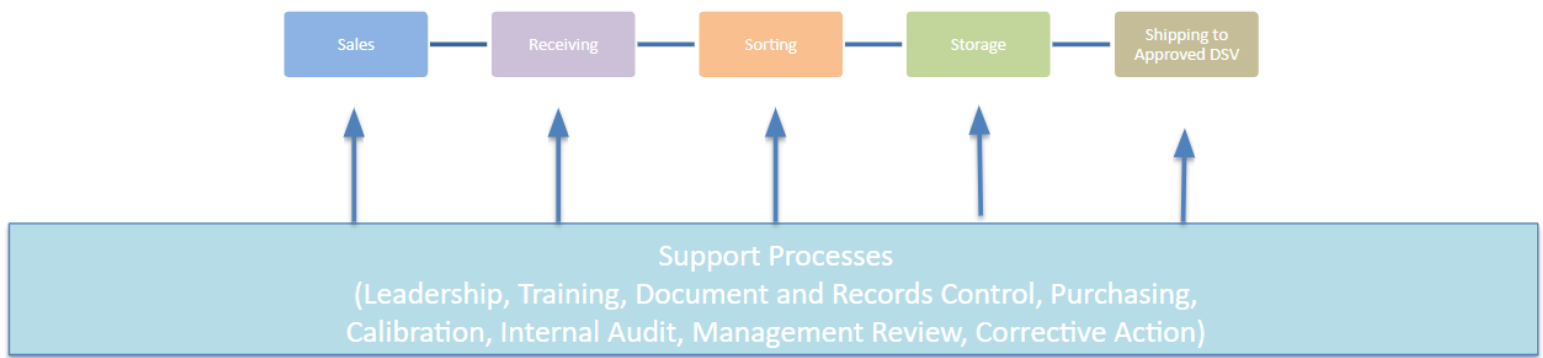
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Legal and Other Requirements Summary List

TYPE	DESCRIPTION	REGULATION	REQUIREMENT SUMMARY	REGULATION LOCATION	RESPONSIBILITY	NOTES
Air Emissions	Emissions of Regulated air	40 CFR 51.101 and 51.102	Standards for air permitting requirements for stationary and mobile sources.	www.epa.gov/epaosper/air/aqa/titles/40cfr51101102.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr51101102.pdf
	Emissions of Regulated air Pollutants	Michigan Air Pollution Control Act (MCL 207.302) (Public Act 200-1)	State Air Pollution Control Requirements for identification of air pollution sources, registration, permitting, monitoring, inspection, maintenance, reporting and record keeping.	www.epa.gov/epaosper/air/aqa/titles/40cfr51101102.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr51101102.pdf
Stormwater Discharge	Stormwater Discharge to the	40 CFR 403.101-103	Requirements on the control of stormwater from residential and industrial stormwater.	www.epa.gov/epaosper/air/aqa/titles/40cfr403101103.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr403101103.pdf
Hazardous and Universal Waste FEDERAL	Hazardous Waste Identification and Listing	40 CFR 261.1-261.14	Requirements for identification and listing of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr261114.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr261114.pdf
	Hazardous Waste Criteria for	40 CFR 261.15-261.16	Criteria for identification and listing of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr26115116.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr26115116.pdf
	Hazardous Waste Manifest System (in Michigan)	40 CFR 261.17-261.18	Requirements for the use of a manifest system for hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr26117118.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr26117118.pdf
	Hazardous Waste Manifest System (in Michigan)	40 CFR 261.19-261.20	Requirements for the use of a manifest system for hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr26119120.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr26119120.pdf
	Universal Waste	40 CFR 261.21-261.22	Requirements for the management of universal waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr26121122.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr26121122.pdf
	Universal Waste	40 CFR 261.23-261.24	Requirements for the management of universal waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr26123124.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr26123124.pdf
	Universal Waste	40 CFR 261.25-261.26	Requirements for the management of universal waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr26125126.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr26125126.pdf
	Universal Waste	40 CFR 261.27-261.28	Requirements for the management of universal waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr26127128.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr26127128.pdf
	Universal Waste	40 CFR 261.29-261.30	Requirements for the management of universal waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr26129130.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr26129130.pdf
	Universal Waste	40 CFR 261.31-261.32	Requirements for the management of universal waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr26131132.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr26131132.pdf
Superfund	Superfund	40 CFR 300.1-300.10	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr300110.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr300110.pdf
	Superfund	40 CFR 300.11-300.12	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr30011112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr30011112.pdf
TSCA Federal	TSCA Federal	40 CFR 370.1-370.10	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr370110.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr370110.pdf
	TSCA Federal	40 CFR 370.11-370.12	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr37011112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr37011112.pdf
EPCRA	EPCRA	40 CFR 371.1-371.10	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr371110.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr371110.pdf
	EPCRA	40 CFR 371.11-371.12	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr37111112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr37111112.pdf
Spill Reporting	Spill Reporting	40 CFR 372.1-372.10	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr372110.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr372110.pdf
	Spill Reporting	40 CFR 372.11-372.12	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf
Hazardous, Universal and Waste, STATE	Hazardous, Universal and Waste, STATE	Michigan Administrative Code (MAC) 207.101-207.110	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf
	Hazardous, Universal and Waste, STATE	Michigan Administrative Code (MAC) 207.111-207.120	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf
Electronic Sampling Law, STATE	Electronic Sampling Law, STATE	Michigan Administrative Code (MAC) 207.121-207.130	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf
	Electronic Sampling Law, STATE	Michigan Administrative Code (MAC) 207.131-207.140	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf
State Law, STATE	State Law, STATE	Michigan Administrative Code (MAC) 207.141-207.150	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf
	State Law, STATE	Michigan Administrative Code (MAC) 207.151-207.160	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf
TRANSPORT	TRANSPORT	49 CFR 171.1-171.10	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf
	TRANSPORT	49 CFR 171.11-171.12	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf
HWH and Safety, FEDERAL	HWH and Safety, FEDERAL	49 CFR 172.1-172.10	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf
	HWH and Safety, FEDERAL	49 CFR 172.11-172.12	Requirements for the management of hazardous waste.	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf	Operations Manager	www.epa.gov/epaosper/air/aqa/titles/40cfr37211112.pdf

Health & Safety Hazard & Safety	Electrical	26 CFR 1010.100-10	The subject addresses electrical safety requirements that are necessary for the protection of employees in their workplaces. Requirements include: All electrical equipment is properly grounded. The grounding (third prong) on all plugs is in place. - Electrical equipment, located near water, is protected by a ground fault circuit interrupter (GFCI). - All electrical and wiring carry the electrical load for which they are rated. - Employees who have a risk of electric shock that is not reduced by a safe level have received training in safe work practices (see 1010.100-10). - Extension cords are not being used in place of permanent wiring. - Cords and wiring are inspected periodically for wear, fraying or burning. Damaged wiring is replaced or repaired immediately. - Wiring components, such as plugs, outlets, junction boxes, are maintained in a good working condition. - Electrical outlets, junction boxes, fuse boxes and switch boxes are kept closed at all times.	www.cfr.gov	Operations Manager
	Access to Exposure and Material Test	26 CFR 1010.100-10	For certain applications in general industry, employee who makes, maintains, controls, repairs or dismantles exposed to blood or other potentially infectious materials.	www.cfr.gov	Operations Manager
	Good Housekeeping	26 CFR 1010.100-10	Employees are reasonably exposed to blood or other potentially infectious materials.	www.cfr.gov	Operations Manager
	Hazard Communication Program	26 CFR 1010.100-10	Requirements for evaluating the potential hazards of chemicals, and communicating that information to the workers in the form of labels, safety data sheets, and other information.	www.cfr.gov	Operations Manager
	OSHA General Duty Clause	26 CFR 1010.100-10	Requirement for employers to keep and have available a written policy, to be furnished to employees, that states the employer's commitment to safety and health.	www.cfr.gov	Operations Manager
	OSHA Training	26 CFR 1010.100-10	Requirement for employers to train and have available a written policy, to be furnished to employees, that states the employer's commitment to safety and health.	www.cfr.gov	Operations Manager
	OSHA Recordkeeping and Reporting Requirements	26 CFR 1010.100-10	Requirement for employers to record and report work-related fatalities, injuries and illnesses.	www.cfr.gov	Operations Manager
	Occupational Safety & Health Standards	26 CFR 1010.100-10	Requirement for employers to comply with OSHA standards.	www.cfr.gov	Operations Manager
	Health & Safety	26 CFR 1010.100-10	Requirement for employers to comply with OSHA standards.	www.cfr.gov	Operations Manager
	Health & Safety	26 CFR 1010.100-10	Requirement for employers to comply with OSHA standards.	www.cfr.gov	Operations Manager
Data Security	Administrative Standards for All General Industry Safety and Health	26 CFR 1010.100-10	Administrative Standards for All General Industry Safety and Health.	www.cfr.gov	Operations Manager
	Primary Data	26 CFR 1010.100-10	Primary Data.	www.cfr.gov	Operations Manager
	Financial Privacy Act	26 CFR 1010.100-10	Financial Privacy Act.	www.cfr.gov	Operations Manager
	Health Insurance	26 CFR 1010.100-10	Health Insurance.	www.cfr.gov	Operations Manager
	Family Educational Rights and Privacy Act	26 CFR 1010.100-10	Family Educational Rights and Privacy Act.	www.cfr.gov	Operations Manager
	Credit Privacy Act	26 CFR 1010.100-10	Credit Privacy Act.	www.cfr.gov	Operations Manager
	Consumer Information (CPI) General Data	26 CFR 1010.100-10	Consumer Information (CPI) General Data.	www.cfr.gov	Operations Manager
	California Consumer Privacy Act	26 CFR 1010.100-10	California Consumer Privacy Act.	www.cfr.gov	Operations Manager
	Health & Safety	26 CFR 1010.100-10	Health & Safety.	www.cfr.gov	Operations Manager
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Import / Export	US Export Regulations	26 CFR 1010.100-10	US Export Regulations.	www.cfr.gov	Operations Manager
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	Inventory	26 CFR 1010.100-10	Inventory.	www.cfr.gov	Operations Manager
	Inventory	26 CFR 1010.100-10	Inventory.	www.cfr.gov	Operations Manager
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	Inventory	26 CFR 1010.100-10	Inventory.	www.cfr.gov	Operations Manager
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	Inventory	26 CFR 1010.100-10	Inventory.	www.cfr.gov	Operations Manager

Interaction of Processes Diagram



4.4.1-F Interaction of Processes Diagram – 1.0
Effective Date: 05-07-25

Focus Material Management Plan

Purpose:

Vesco Clean Energy shall analyze, plan, regularly review, and update as necessary how the FMs that pass through its facility or control will be properly managed both on-site and down the recycling chain.

Type of Electronic Equipment	Type of FM/Controlled Stream contained in EE	Next Process (DSV)	Output	Still an FM/Controlled Stream?
Batteries - Alkaline w/o mercury	N/A	Materials Recovery	Batteries	NO
Batteries for Recycling - (all chemistries except alkaline without mercury) ex. Lead-Acid Sealed Lead Acid, Lithium metal, Lithium-Ion, Ni-Cad, NiMH	Batteries	Materials Recovery	Batteries	YES
Cable/Satellite Boxes	Circuit Boards Plastic	Materials Recovery	Circuit Boards	YES
			Wires/Metals	NO
			Plastic	YES
Cell phones	Batteries Circuit Boards Plastic	Test & Repair	Tested & Functioning	NO
			Non-Functioning - see Materials Recovery	YES
		Parts Harvesting	Screen	YES
			Circuit Boards	YES
		Materials Recovery	Non-Functioning components	YES
			Circuit Boards	YES
			Batteries	YES
			Screen, w/flexible circuitry attached	YES
			Wires/Metals	NO
			Plastic	YES
Circuit Boards - mixed, loose	Circuit Boards	Materials Recovery	Circuit Boards	YES
CPU (Processor) w/circuit board	Circuit Boards	Test & Repair	Tested & Functioning	NO
			Non-Functioning - Materials Recovery	YES
CPU (Processor) w/o circuit board and IC chips	N/A	Test & Repair	Tested & Functioning	NO
			Non-Functioning - Materials Recovery	NO
CRT TVs and Monitors	CRT Circuit Boards Plastic	Not accepted – Receiving and Sorting employees are trained to identify CRTs and are instructed to notify a Supervisor if found.	N/A	N/A
Desktop computers	Batteries Circuit Boards Plastic	Test & Repair	Tested & Functioning	NO
			Non-Functioning - see Materials Recovery	YES
		Parts Harvesting	Hard Drives	YES
			Memory	YES
		Materials Recovery	Circuit Boards	YES
			Batteries	YES
			Wires/Metals	NO
Docking stations	Circuit Boards Plastic	Materials Recovery	Plastic	YES
			Circuit Boards	YES
			Wires/Metals	NO
Drives - Hard Drives and Optical Drives	Circuit Boards Plastic	Test & Repair	Tested & Functioning	NO
			Non-Functioning - see Materials Recovery	YES
		Materials Recovery	Circuit Boards	YES
			Metal	NO
			Plastic	YES
Electric Motors, Ballasts, Capacitors, Transformers	Circuit Boards Plastic	Materials Recovery	Circuit Boards	YES
			Wires/Metals	NO
			Plastic	YES
Fans	Circuit Boards Plastic	Materials Recovery	Circuit Boards	YES
			Wires/Metals	NO
			Plastic	YES
Flat TVs and Monitors	Batteries Circuit Boards Mercury lamps Plastic	Test & Repair	Tested & Functioning	NO
			Non-Functioning - see Materials Recovery	YES
		Parts Harvesting	Hard Drives	YES
			Screens with mercury lamps	YES
		Materials Recovery	Circuit Boards	YES
			Wires/Metals	NO
			Plastic	YES
Game consoles	Circuit Boards Plastic	Materials Recovery	Circuit Boards	YES
			Wires/Metals	NO
			Plastic	YES
Laptop computers	Batteries Circuit Boards Mercury lamps Plastic	Test & Repair	Tested & Functioning	NO
			Non-Functioning - see Materials Recovery	YES
		Parts Harvesting	Hard Drives	YES
			Memory	YES
		Materials Recovery	Laptop screens with mercury lamps	YES
			Batteries	YES
			Circuit Boards	YES
Low Grade Electronics - Mice & Keyboards	Batteries Circuit Boards Plastic	Test & Repair	Tested & Functioning	NO
			Non-Functioning - see Materials Recovery	YES
		Materials Recovery	Circuit Boards	YES
			Batteries	YES
Networking Devices - Routers, switches	Circuit Boards Plastic	Test & Repair	Tested & Functioning	NO
			Non-Functioning - see Materials Recovery	YES
		Parts Harvesting	Hard Drives	YES
			Memory	YES
		Materials Recovery	Circuit Boards	YES
			Wires/Metals	NO
			Plastic	YES
Phones - non-cellular	Circuit Boards Plastic	Materials Recovery	Circuit Boards	YES
			Wires/Metals	NO
			Plastic	YES

Focus Material Management Plan (cont'd)

Power Adapters	Circuit Boards Plastic	Materials Recovery	Circuit Boards	YES
			Wires/Metals	NO
			Plastic	YES
Power Supplies	Circuit Boards Plastic	Materials Recovery	Circuit Boards	YES
			Wires/Metals	NO
			Plastic	YES
Printers, Multifunction Printers and Copiers, Fax Machines	Batteries Circuit Boards Plastic	Test & Repair	Tested & Functioning	NO
			Non-Functioning - see Materials Recovery	YES
			Hard Drives	YES
		Parts Harvesting	Memory	YES
			Non-Functioning components	YES
		Materials Recovery	Circuit Boards	YES
			Batteries	YES
			Wires/Metals	NO
			Plastic	YES
Servers	Batteries Circuit Boards Plastic	Test & Repair	Tested & Functioning	NO
			Non-Functioning - see Materials Recovery	YES
			Hard Drives	YES
		Parts Harvesting	Memory	YES
			Non-Functioning components	YES
		Materials Recovery	Circuit Boards	YES
			Batteries	YES
			Wires/Metals	NO
			Plastic	YES
Tablets	Batteries Circuit Boards Plastic	Test & Repair	Tested & Functioning	NO
			Non-Functioning - see Materials Recovery	YES
			Screen	YES
		Parts Harvesting	Circuit Boards	YES
			Non-Functioning components	YES
		Materials Recovery	Circuit Boards	YES
			Batteries	YES
			Screen, w/flexible circuitry attached	YES
			Wires/Metals	NO
Telephone/networking equipment - with mercury switches on circuit board	Mercury Circuit board	Materials Recovery	Plastic	YES
			Circuit Boards	YES
			Mercury	YES
UPS - Universal Power Supply	Batteries Circuit Boards Plastic	Test & Repair	Tested & Functioning	NO
			Non-Functioning - see Materials Recovery	YES
		Materials Recovery	Circuit Boards	YES
			Batteries	YES
			Wires/Metals	NO
Wearables (watches, etc.)	Batteries Circuit Boards Plastic	Test & Repair	Plastic	YES
			Tested & Functioning	NO
			Non-Functioning - see Materials Recovery	YES
		Parts Harvesting	Screen	YES
			Circuit Boards	YES
			Non-Functioning components	YES
		Materials Recovery	Circuit Boards	YES
			Batteries	YES
			Screen, w/flexible circuitry attached	YES
Wire	N/A	Materials Recovery	Wires/Metals	NO
			Plastic	YES
			N/A	NO
Wire Mixed W/ AC Adapter	Circuit Boards	Materials Recovery	Circuit Boards	YES
Electrical equipment manufactured before 1980	PCBs	Not accepted – Receiving and Sorting employees are trained to identify PCBs and are instructed to notify a Supervisor if found.	N/A	N/A
PV Modules	Solar Cells Plastic	Not accepted – Receiving and Sorting employees are trained to identify PVMs and are instructed to notify a Supervisor if found.	N/A	N/A

Non-Focus Materials Requiring Specific Management

Vesco Clean Energy shall manage print cartridges in accordance with Core Requirement 2 through print cartridge remanufacturers, recyclers, or Original Equipment Manufacturers (OEM), in facilities that meet all applicable regulatory requirements to receive these print cartridges, and that use technology designed to safely and effectively manage ink and toner print cartridges.

Vesco Clean Energy shall manage all equipment, components, and materials that pass through its facility or control that do not contain Focus Materials or are not electronic equipment, in accordance with Core Requirement 2, and otherwise integrated into the QEHSMS, to ensure handling that is in full legal compliance, protective of the environment, and protective of worker and public health and safety. The following non-FMs are reused/recycled:

- Cardboard and paper are recycled through the waste management vendor.
- Aluminum cans and plastic are recycled through the waste management vendor.
- Pallets and Gaylords, if received and in good conditions, are reused in house.
- Packaging material, if received, is reused in house.
- Steel drums are reused or recycled through metals management vendor.

Related and Supporting Documents which document the processing steps

- 8.1-1-P Receiving Procedure
- 8.1-2-P Sorting, Categorization and Processing Procedure
- 8.1-3-P Dismantling Procedure
- 8.1-4-P UW Battery Storage and Shipping Procedure
- 8.1-5-P Material Storage and Shipping Procedure
- 8.1-6-P Shredding Procedure
- A.A.1-P Downstream Vendor Selection Program
- A.A.2-F Downstream Vendor Questionnaire
- A.A.3-F Downstream Recycling Chain Flowchart



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

SPECIAL PERMIT AUTHORIZATION

DOT-SP 16532

EXPIRATION DATE: 2027-03-31

GRANTEE: Vesco Clean Energy LLC
Southfield, MI

In response to your March 31, 2025, application for party status to DOT-SP 16532, Vesco Clean Energy LLC is hereby granted party status to DOT-SP 16532 as a shipper only in accordance with 49 CFR 107.113.

Copies of this special permit may be obtained by accessing the Office of Hazardous Materials Safety Homepage at <https://www.phmsa.dot.gov/approvals-and-permits/hazmat/special-permits-search>. The most recent revision of the special permit supersedes all previous revisions of the special permit. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

If you have questions regarding this action please call the Office of Hazardous Materials Safety, General Approvals and Permits Branch at (202) 366-4535.

Issued in Washington D.C. on **April 21, 2025**.

for William Schoonover
Associate Administrator for Hazardous Materials Safety



Certificate of Registration

This certifies

Vesco Clean Energy LLC

4935 Starr Street Southeast
Grand Rapids, Michigan, 49546, United States

has been assessed by NSF-ISR and found to be in conformance to the following standard(s):

The Sustainable Electronics Reuse & Recycling (R2) Standard v3 (R2V3)

as applied by the R2 code of practices

Scope of Single Facility Certification:

Downstream vendor management and brokering of batteries from used electronics.

This R2 Facility performs the following applicable R2 Process Requirements at this location(s)

and has been audited to the requirements for each as identified:

Appendix A - Downstream Recycling Chain

Appendix F - Brokering

Sameer Vachani
Senior Director, NSF-ISR

Certificate Number:	C0879901-R21
Certificate Decision Date:	24-APR-2026
Certificate Issue:	24-APR-2026
Cycle Effective Date:	24-APR-2026
Certificate Expiration Date:	23-APR-2029



Issued by:
NSF International Strategic Registrations (NSF-ISR)
789 N. Dixboro Road, Ann Arbor, MI 48105 USA

Authorized Certification and/or Accreditation Marks. This certificate is property of NSF-ISR and must be returned upon request.

*Company is audited for conformance at regular intervals. To verify certification call (888) NSF-9000 or visit our web site at www.nsf-isr.org



The certification referenced above is accomplished pursuant to SERI's R2 Code of Practices through an audit of a sample of the certificate holder's facilities and/or activities within the limited written scope appearing on this certificate. Certification is not a comprehensive validation or verification of all conditions. The R2v3 Standard is offered "AS-IS" and without warranty, and any reliance otherwise, by the certificate holder or any third party, is expressly disclaimed by SERI. The use, display, and reference to the R2v3 Certification Mark printed on this certificate is governed by license agreement(s) entered between the certificate holder and SERI. Certificate authenticity and validity can be verified at <https://r2directory.org>.



Certificate of Registration

This certifies

Vesco Clean Energy LLC

4935 Starr Street Southeast
Grand Rapids, Michigan, 49546, United States

has been assessed by NSF-ISR and found to be in conformance to the following standard(s):

RIOS:2016

Scope of Certification:

Management of end-of-life electronics recycling including brokering, on-site service, collection, aggregation and sorting of batteries from used electronics.

Sameer Vachani
Senior Director, NSF-ISR

Certificate Number:	C0879901-RI1
Certificate Decision Date:	24-APR-2026
Certificate Issue Date:	27-APR-2026
Cycle Effective Date:	24-APR-2026
Certificate Expiration Date*:	23-APR-2029

Issued by:

NSF International Strategic Registrations (NSF-ISR)
789 N. Dixboro Road, Ann Arbor, MI 48105 USA

Authorized Certification and/or Accreditation Marks. This certificate is property of NSF-ISR and must be returned upon request.

*Company is audited for conformance at regular intervals. To verify certification call (888) NSF-9000 or visit our web site at www.nsf-isr.org





CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

2/27/2026

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Kapnick Insurance Group 333 Industrial Dr PO Box 1801 Adrian MI 49221-7801	CONTACT NAME: Candace Rothermel PHONE (A/C, No, Ext): 517-366-2749 E-MAIL ADDRESS: candace.rothermel@kapnick.com FAX (A/C, No): 517-263-6658
INSURED Vesco Clean Energy, LLC 16055 West 12 Mile Road Southfield MI 48076	INSURER(S) AFFORDING COVERAGE INSURER A : Zurich American Insurance Company INSURER B : Crum & Forster Specialty Co. INSURER C : Ironshore Specialty Insurance Co INSURER D : Houston Specialty Insurance Company INSURER E : INSURER F :

COVERAGES

CERTIFICATE NUMBER: 1286010484

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	☒ COMMERCIAL GENERAL LIABILITY ☐ CLAIMS-MADE ☒ OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: ☐ POLICY ☐ PRO-JECT ☒ LOC OTHER:			GLO3538007-02	3/1/2026	3/1/2027	EACH OCCURRENCE \$2,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$100,000 MED EXP (Any one person) \$10,000 PERSONAL & ADV INJURY \$2,000,000 GENERAL AGGREGATE \$4,000,000 PRODUCTS - COMP/OP AGG \$4,000,000 Per Loc/Project Aggr \$2,000,000
A	☒ AUTOMOBILE LIABILITY ☒ ANY AUTO ☐ ALL OWNED AUTOS ☒ HIRED AUTOS ☒ MCS-90 ☐ SCHEDULED AUTOS ☒ NON-OWNED AUTOS			BAP3538008-02	3/1/2026	3/1/2027	COMBINED SINGLE LIMIT (Ea accident) \$5,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
B	☒ UMBRELLA LIAB ☒ EXCESS LIAB DED RETENTION \$			SEO-156050	3/1/2026	3/1/2027	EACH OCCURRENCE \$3,000,000 AGGREGATE \$3,000,000 \$
A	☒ WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N ☐ N/A		WC3538006-02	3/1/2026	3/1/2027	☒ PER STATUTE E.L. EACH ACCIDENT \$1,000,000 E.L. DISEASE - EA EMPLOYEE \$1,000,000 E.L. DISEASE - POLICY LIMIT \$1,000,000
C D	Pollution Liability Professional Liability			ISPILLSCHFNNW002 MEO-HS-0008992-00	3/1/2025 2/19/2026	3/1/2028 3/1/2027	Each Incident 2,000,000 Aggregate Limit 3,000,000 Each Claim/Aggregate 1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Excess Liability Policy
Carrier: Travelers Property Casualty Insurance Company of America
Policy No: CUP-B0441158-26-NF
Term: 03-01-26 to 03-01-27

Limit(s):
\$5,000,000 - Each Occurrence
\$5,000,000 - Annual Aggregate
See Attached...

CERTIFICATE HOLDER**CANCELLATION**

For Information Purposes Only

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

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ADDITIONAL REMARKS SCHEDULE

Page 1 of 1

AGENCY Kapnick Insurance Group		NAMED INSURED Vesco Clean Energy, LLC 16055 West 12 Mile Road Southfield MI 48076
POLICY NUMBER		
CARRIER	NAIC CODE	EFFECTIVE DATE:

ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,
FORM NUMBER: 25 **FORM TITLE:** CERTIFICATE OF LIABILITY INSURANCE

Excess of Underlying Insurance

Stop Gap Liability:
 Carrier: Zurich American Insurance Company
 Policy No: GLO3538007-02
 Term: 03-01-26 to 03-01-27

Limits of Insurance -
 Bodily Injury by Accident - \$1,000,000 each accident
 Bodily Injury by Disease - \$1,000,000 aggregate limit
 Bodily Injury by Disease - \$1,000,000 each employee

AUTOMATIC STATUS POLICY FORMS (WHEN REQUIRED BY WRITTEN CONTRACT OR WRITTEN AGREEMENT WITH NAMED INSURED, PER POLICY TERMS & CONDITIONS)

Certificate holder is named as additional insured, written contract required, as follows:

General Liability per form UGL1345 & UGL2162
 Automobile Liability per form UCA424

General Liability is Primary and Non-Contributory per form UGL1345

Waivers of Subrogation apply in favor of the certificate holder, written contract required, as follows:

General Liability per form UGL1345
 Automobile Liability per form UCA424
 Workers' Compensation per form WC000313

Should any of the above described policies be cancelled before the expiration date thereof, the issuing insurer will endeavor to mail 30 days written notice, (10 days for non-payment of premium), to the certificate holder named, but failure to do so shall impose no obligation or liability of any kind upon the insurer, its agents, or representatives.

Re: 16055 W 12 Mile Rd., Southfield, MI 48076 & 4935 Starr St. SE, Grand Rapids, MI 49546

**Request for Taxpayer
Identification Number and Certification**

Go to www.irs.gov/FormW9 for instructions and the latest information.

**Give form to the
requester. Do not
send to the IRS.**

Before you begin. For guidance related to the purpose of Form W-9, see *Purpose of Form*, below.

Print or type. See Specific Instructions on page 3.	1 Name of entity/individual. An entry is required. (For a sole proprietor or disregarded entity, enter the owner's name on line 1, and enter the business/disregarded entity's name on line 2.) VESCO CLEAN ENERGY LLC	
	2 Business name/disregarded entity name, if different from above.	
	3a Check the appropriate box for federal tax classification of the entity/individual whose name is entered on line 1. Check only one of the following seven boxes. ☐ Individual/sole proprietor ☐ C corporation ☐ S corporation ☐ Partnership ☐ Trust/estate ☒ LLC. Enter the tax classification (C = C corporation, S = S corporation, P = Partnership) P Note: Check the "LLC" box above and, in the entry space, enter the appropriate code (C, S, or P) for the tax classification of the LLC, unless it is a disregarded entity. A disregarded entity should instead check the appropriate box for the tax classification of its owner. ☐ Other (see instructions)	4 Exemptions (codes apply only to certain entities, not individuals; see instructions on page 3): Exempt payee code (if any) _____ Exemption from Foreign Account Tax Compliance Act (FATCA) reporting code (if any) _____ <i>(Applies to accounts maintained outside the United States.)</i>
	3b If on line 3a you checked "Partnership" or "Trust/estate," or checked "LLC" and entered "P" as its tax classification, and you are providing this form to a partnership, trust, or estate in which you have an ownership interest, check this box if you have any foreign partners, owners, or beneficiaries. See instructions ☐	
	5 Address (number, street, and apt. or suite no.). See instructions. 16055 W. 12 MILE ROAD 6 City, state, and ZIP code SOUTHFIELD, MI 48076 7 List account number(s) here (optional)	Requester's name and address (optional)

Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the instructions for Part I, later. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN*, later.

Note: If the account is in more than one name, see the instructions for line 1. See also *What Name and Number To Give the Requester* for guidelines on whose number to enter.

Social security number										
			-				-			
or										
Employer identification number										
3	3	-	3	3	2	8	2	9	1	

Part II Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
2. I am not subject to backup withholding because (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
3. I am a U.S. citizen or other U.S. person (defined below); and
4. The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

Certification instructions. You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and, generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions for Part II, later.

Sign Here Signature of U.S. person *Lisa A. Murray*

Date 01-06-2026

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Future developments. For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to www.irs.gov/FormW9.

What's New

Line 3a has been modified to clarify how a disregarded entity completes this line. An LLC that is a disregarded entity should check the appropriate box for the tax classification of its owner. Otherwise, it should check the "LLC" box and enter its appropriate tax classification.

New line 3b has been added to this form. A flow-through entity is required to complete this line to indicate that it has direct or indirect foreign partners, owners, or beneficiaries when it provides the Form W-9 to another flow-through entity in which it has an ownership interest. This change is intended to provide a flow-through entity with information regarding the status of its indirect foreign partners, owners, or beneficiaries, so that it can satisfy any applicable reporting requirements. For example, a partnership that has any indirect foreign partners may be required to complete Schedules K-2 and K-3. See the Partnership Instructions for Schedules K-2 and K-3 (Form 1065).

Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS is giving you this form because they