Audit Information

9384 Highway 22A
Trail, BC V1R 4W6
www.retreivtech.com
(250) 367-9882
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Company Overview:  
*Forward thinking strategies for a renewable future*

Retriev Technologies is a Joint venture company with KBI and the Heritage Group. The Retriev battery group brings a suite of services that is unparalleled in the North American battery recycling industry. To this end, under the combined management of KBI and THG, Retriev has unmatched resources to serve our customers.

For nearly 30 years, the Retriev team in Trail, British Columbia, has been safely processing highly reactive batteries, becoming the most trusted recycler in the world at managing this material. Many international companies choose to ship their lithium batteries to Retriev from locations halfway across the globe just to ensure their batteries are managed in the safest way possible. Retriev is the only company in the world that can recycle any size or type of lithium battery.

Additionally, Retriev has been engaged in collaborative work with our partners to introduce recycled battery materials into the manufacturing of new battery products, thus creating a sustainable, lower cost, ecosystem for the recycling and utilization of these finite resources such as cobalt, nickel, and lithium that are used in the manufacturing of new batteries.

Retriev Technologies, Inc. is a privately held corporation organized under the laws of the State of Delaware. It’s corporate offices are located in Lancaster, Ohio.

- 2 fully permitted lithium battery recycling facilities – Lancaster, Ohio and Trail, British Columbia Canada
- Warehousing, logistics, and battery repair/2nd life solutions in Brea, California
- Over 190 locations in the United States for regional support for dealers
- Field services for a lower cost solution for non-Hazmat dealers
Facility Overview: Trail, B.C. Facility

Retriev Technologies Ltd. (Retriev) specializes in processing and recycling of lithium battery chemistries; including lithium sulphur dioxide, thionyl chloride, iron disulphide, manganese dioxide and lithium ion batteries, lithium battery components, and scrap lithium metals. Additional lithium chemistries may be processed upon submission of technical data and proposed emissions monitoring for review by the British Columbia, Ministry of Environment and Climate Change Strategy (MOE).

Retriev is located in Trail, B.C. Canada where it operates a lithium hazardous waste storage and treatment facility. The facility began operation in September of 1993 on 11 acres of industrial zoned property that was previously occupied by a chainsaw fabrication plant and subsequently leased by a building supplies company warehouse. The site currently includes a 32,000 sq. ft. office and production building and 3,830 sq. ft. of separate reinforced concrete battery storage bunkers.

The Retriev facility operates under the authority of the MOE as granted by the following permits:
- BC MOE Operational Plan (RS-12978) for the storage, treatment, and recycling of lithium hazardous wastes.
- Permit PA-12975 for the discharge of contaminants to the atmosphere.

Permit PS-12978 was issued on June 30, 1994 and amended for operational changes and facility expansion. This permit was subsequently converted to an Operational Plan in 2006 as required by the BC MOE. The permit defines the types and quantities of materials which may be managed, and the handling and storage methods employed. A copy of the plan can be made available for review upon request.

Permit PA-12975 was issued July 6, 1994 and last amended on August 14, 2014. This permit defines the volumes and concentration of constituents discharged to the atmosphere and defines the monitoring program and reporting requirements.
Facility Overview: Site Characteristics

The Retriev facility is located in Columbia Gardens Industrial Park, an area zoned for heavy industry, 12 km south of Trail, B.C. on the east side of Highway 22A in the Columbia River Valley.

Adjacent Properties
Alpine Recycling (household waste recycling), KC Recycling (metal and automotive batteries), XL Quality Industrial Services, and an Auto Recycling facility are located to the north. The Trimac reloading facility is located southwest and across the highway, where the Teck smelter in Trail trans-loads various feedstock and products including ore concentrates, lead and zinc for shipment to and from around the world. Further southwest (approximately 0.5 km) is a sulfuric acid shipping facility operated by West Can. There are no immediate adjacent developments to the East or West of the facility. There are two residences located within a kilometer north of the site. The Trail Regional Airport is located 2.5 km north of the facility on highway 22A.

Facility Overview: Geology and Hydrology

The nearest body of water, the Columbia River, is approximately 750 meters west, and 100 meters below the mezzanine of the valley. It flows south into the United States approximately 5 km downstream and is used for potable water, power generation and recreation.

The area surrounding the site is predominantly alluvial gravel with a relatively high permeability. Groundwater flow is westward towards the river. A small creek originates about 1 km above the Retriev facility on the mezzanine however, surface water penetrates the ground into gravel bed prior to reaching the facility.

The Regional District of Kootenay Boundary supplies water to the industrial park from a well located at the north end of the park. Based on the depth of the well, the water table is estimated to be 300' below the surface, approximately at the surface level of the Columbia River. There are no underground storage tanks on the property. There is no known soil contamination at the site.
Facility Overview:
Site Security

The operational portion of the property is surrounded by a chain link fence topped by three strands of barbed wire. The gate is kept closed except during deliveries or outbound shipments. Signs indicating authorized personnel only are posted where clearly visible.

Access to the facility is controlled by card readers, and doors are locked to outside traffic. The facility is secured during non-operational hours by electronic surveillance. Security includes continuously monitored smoke detectors and heat-rise sensors. Security cameras are also installed.

Facility Overview:
Site Location Map
Facility Overview:
Site Map
PERMIT
12975

Under the Provisions of the Environmental Management Act

Toxco Waste Management Ltd.
DBA Retriev Technologies

is authorized to discharge emissions to the air from a Hazardous Waste Storage, Treatment and Recycling Facility located at the Columbia Gardens Industrial Park in Trail, British Columbia, subject to the terms and conditions listed below. Contravention of any of these conditions is a violation of the Environmental Management Act and may lead to prosecution.

This Permit supersedes and amends all previous versions of Permit 12975 issued under Part 2, Section 14 of the Environmental Management Act.

1. AUTHORIZED DISCHARGES

1.1 This section applies to the continuous discharge of air from a SCRUBBER STACK. The site reference number for this discharge is E298650.

1.1.1 The maximum rate of discharge is 11.8 cubic metres per second, only while the source authorized in Section 1.2 is not operational.

1.1.2 The characteristics of the discharge must be equivalent to or better than:

Total Particulate Matter 30 mg/m³
Hydrochloric Acid Mist 15 mg/m³
Ammonia 46 ppm

Date issued: July 6, 1996
Date amended: August 14, 2014

Sajed A. Bahia, Ph.D., P.Ag.
for Director, Environmental Management Act
Southern Interior Region
**Compliance History**

On March 27, 2019 Retriev received an Advisory Letter from the BC Ministry of Environment and Climate Change Strategy. The Advisory Letter (for Permit PA-12975) centered around two items relating to our stack testers credentials and production rates at the time of sampling versus the remainder of the year. Both issues were addressed in a response to the Ministry on April 9th, 2019. On April 17, 2020 Retriev received a further Advisory Letter (PA-12975). This advisory letter further related to our stack testers credentials as well as a method being used during stack testing. Both items were corrected on the next compliance test.

On March 27, 2019, Retriev received a Warning Letter (for authorization RS-12978) from the BC Ministry of Environment and Climate Change Strategy. The letter contained administrative items. Items were addressed in a letter to the Ministry dated April 26th, 2019. Retriev has received subsequent annual Warning Letters from the Ministry in relation to administrative items first identified in 2019. Retriev continues to work with the Ministry towards resolution. The latest round of documents was submitted to the Ministry in November of 2021, with response received from the Ministry on March 23, 2022. Retriev is currently preparing a further round of documents, for submission.

**Insurance and Financial Responsibility**

Retriev is covered by the following insurance provided through BFL Canada Insurance Services Inc.:

<table>
<thead>
<tr>
<th>Coverage</th>
<th>Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pollution Liability</td>
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<tr>
<td>Commercial Liability</td>
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Retriev is additionally covered by the province-wide Workers’ Compensation Insurance. Retriev maintains a $300,000 Bond to the credit of the Ministry of the Environment to cover all anticipated closure costs. Adjustments to the deposit are made periodically in relation to the level of activity and the quantities of materials stored on site.
This certificate is issued as a matter of information only and confers no rights upon the certificate holder. This certificate does not amend, extend or alter the coverage afforded by the policies below.

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<th>COMPANIES AFORDING COVERAGE</th>
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<td><strong>COMPANY A</strong></td>
<td>ASPEN INSURANCE UK LIMITED</td>
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<tr>
<td><strong>COMPANY B</strong></td>
<td>NORTHBRIDGE INSURANCE COMPANY</td>
</tr>
<tr>
<td><strong>COMPANY C</strong></td>
<td></td>
</tr>
</tbody>
</table>

**CERTIFICATE OF INSURANCE**

**BROKER**
Reliance Insurance Agencies Ltd.
4853 Hastings Street
Burnaby, BC V5C 2L1
(T)604-255-4616 (F)604-255-1117 (TF)1-877-354-2623

**INSURED**
Retriev Technologies Ltd. Fka Toxco Waste Management Ltd. dba Retriev Technologies
9384 HIGHWAY 22A
TRAIL, BC V1R 4L5

**COVERAGES**
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.

<table>
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<th>LETTER</th>
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<th>Policy Number</th>
<th>Policy Effective Date (YYYY/MM/DD)</th>
<th>Policy Expiration Date (YYYY/MM/DD)</th>
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<td>COMMERCIAL GENERAL LIABILITY</td>
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<td>TENANT’S LEGAL LIABILITY</td>
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<td></td>
<td>NON-OWNED AUTOMOBILE LIABILITY</td>
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<td>CBC 1953654</td>
<td>2022/03/26</td>
<td>2023/03/26</td>
<td>AT: 9384 HIGHWAY 22A TRAIL, BC V1R 4L5</td>
</tr>
</tbody>
</table>

**DESCRIPTION OF OPERATIONS / LOCATIONS / AUTOMOBILES / SPECIAL ITEMS**
WITH RESPECT TO THE OPERATIONS OF THE NAMED INSURED ONLY.
ABOVE COVERAGE IS SUBJECT TO TERMS AND CONDITIONS, EXCLUSIONS AND LIMITATIONS OF THE ABOVE STATED POLICIES.

*** EVIDENCE OF INSURANCE ***

This certificate supercedes and replaces any previously issued certificate.

ERIN THOMAS, ACCOUNT MANAGER
RELIANCE INSURANCE AGENCIES LTD.
Process Description

Materials are received from locations throughout world. The batteries may arrive in a variety of containers (e.g., in drums, crates or palletized boxes). The batteries are inspected, weighed, and sorted once received for storage.

Primary Batteries
Just prior to processing the packaging is removed and the batteries are weighed and placed into liquid nitrogen. This cools the batteries thus minimizing the reactivity of the batteries during shredding and treatment. Gases or fumes liberated during shredding are controlled in a wet scrubber system and a travelling bed filter. Atmospheric emissions are monitored to ensure compliance. Soluble components of the battery that are dissolved in the solution are precipitated from solution and recovered and processed to produce lithium carbonate. Scrap metal and plastic from the batteries is also recovered from the treatment tank. The scrap is separated into metallic and non-metallic fractions for recycle and/or disposal. A flow diagram for the process is shown below.

Lithium-Ion Batteries
Lithium-ion batteries, for example from HEV and EV's, are dismantled to the cell or module level, depending on construction. Various steel, electrical, and plastic components are recycled. Lithium-ion consumer batteries are processed as received after sorting. Cells are crushed and size-reduced under a process solution. The crushed cells undergo a size separation, separating the material into a metal and plastic fraction, and a slurry. The slurry is filtered to produce a nickel-cobalt filter cake. The metals and plastic fragments go through a sink float separation, to produce a mixed metal (copper-aluminum mixture) and a plastic fraction. Solution from the filtration step contains the organic portion of the electrolyte and is reused in the crushing process. The organic components breakdown within the process.
Operations Diagrams
Lithium Ion Process

LITHIUM ION BATTERIES

Concrete Storage Bunkers

Air Handling System (25,000 cfm)

To Atmosphere
MOE PA-12975

Scrubber & Filter

Mixed Plastic

Mixed Metals
(Copper - Aluminum)

Sink - Float

Crush, Screen

Filter

Nickel-Cobalt Cake
Record Keeping

Profiles – all generators are required to complete and submit a Lithium Waste Profile Sheet for approval prior to shipping any materials. This profile typically involves identification of the particular chemistry of the batteries to be shipped. Analytical, dimensional and structural information may be requested following review of the profile. A sample may be required for prescreening. Each profile is assigned an approval number and that profile number is identified on the manifest. A copy of the profile is kept in perpetuity.

Manifest – signed copies of all shipping papers and hazardous waste manifests are maintained on site as required. Retriev is currently in the process of electronically recording and storing all paperwork relating to shipments on and off-site. Copies are maintained in perpetuity.

Certificate of Acceptance – are issued to each generator upon receipt and acceptance of the lithium wastes at the facility. Copies are maintained in perpetuity.

Certificate of Recycling – are issued upon complete recycling of the material. Process Records – records of selected process, operating conditions, material receipt, and movement, are maintained to assist in process control and improvement. A report of production volumes and inventory levels is submitted to the MOE. Copies are maintained for a minimum of three years.

Emissions monitoring – is conducted on an annual basis by an independent third party environmental firm as required by the B.C. Ministry of Environment. A copy of this report is submitted to the Ministry. Additional monitoring of emissions is conducted on an as-needed basis when process conditions warrant. Copies are maintained for a minimum of five years.

Regulatory inspections – a weekly environment and safety inspection is made of the facility. The record of this inspection is used to ensure that any deficiencies are corrected. Inspection records are maintained for a minimum of five years. Maintenance – a checklist identifies weekly, monthly, quarterly, semi-annual and annual maintenance tasks. Records of maintenance activities are maintained. Maintenance required on a daily basis is performed according to written procedures. Maintenance records are kept a minimum of five years.
**Personnel Training**

Retriev provides the following training to employees:

- First Aid
- WHMIS (Workplace Hazardous Materials Information System)
- Emergency Contingency Plan
- Personal Protective Equipment
- Process Operations
- Confined Space
- Lock-out / Tag-out
- Propane Gas Handling
- Liquid Nitrogen Safety

**Certifications**

Retriev maintains the following certifications:

R2:2013
ISO 14001: 2015
ISO 45001: 2018

Copies of the certificates are found below.
PERRY JOHNSON
REGISTRARS, INC.

Certificate of Registration

Perry Johnson Registrars, Inc., has audited
the Environmental Management System of:

Retrieval Technologies Ltd.
9384 Highway 22A, Trail, BC V1R 4W6 Canada

(Hereinafter called the Organization) and hereby declares that
Organization is in conformance with:

ISO 14001:2015

This Registration is in respect to the following scope:

Receiving, Sorting, and Recycling of Batteries and Portable Handheld Electronics containing
Lithium Batteries

This Registration is granted subject to the system rules governing the Registration referred to above, and the
Organization hereby covenants with the Assessment body duty to observe and comply with the said rules.

Terry Boboige, President
Perry Johnson Registrars, Inc. (PJR)
755 West Big Beaver Road, Suite 1340
Troy, Michigan 48084
(248) 358-3388

The use of the UKAS accreditation symbol is in respect to the activities covered by the Accreditation Certificate Number 0105.

The validity of this certificate is dependent upon ongoing surveillance.

Effective Date: February 27, 2022
Expiration Date: February 26, 2025
Certificate No.: C2022-00174
PERRY JOHNSON
REGISTRARS, INC.

Certificate of Registration

Perry Johnson Registrars, Inc., has audited
the Occupational Health and Safety Management System of:

Retriev Technologies Ltd.
9384 Highway 22A, Trail, BC V1R 4W6 Canada

(Hereinafter called the Organization) and hereby declares that
Organization is in conformance with:

ISO 45001:2018

This Registration is in respect to the following scope:

Receiving, Sorting, and Recycling of Batteries and Portable Handheld Electronics containing
Lithium Batteries

This Registration is granted subject to the system rules governing the Registration referred to above, and the
Organization hereby commits to maintain the Management System and comply with the said rules.

Terry Boboige, President
Perry Johnson Registrars, Inc. (PJR)
755 West Big Beaver Road, Suite 1340
Troy, Michigan 48084
(248) 358-3388

The use of the UKAS accreditation symbol is in respect to the activities covered by the Accreditation Certificate Number 0105.

The validity of this certificate is dependent upon ongoing surveillance.

Effective Date:
February 27, 2022

Expiration Date:
February 26, 2025

Certificate No.:
C2022-00175
PERRY JOHNSON REGISTRARS, INC.

Certificate of Registration

Perry Johnson Registrars, Inc., has audited
the Sustainable Electronics Reuse & Recycling (R2) Standard of
Retriev Technologies Ltd.
9384 Highway 22A, Trail, BC V1R 4W6 Canada

The organization has been audited by a certification body that is in conformance with ISO/IEC
17021 requirements and applicable Accreditation Body requirements. The organization is found to be
in conformance with the R2 Standard as applied by the R2 Code of Practices.

The Sustainable Electronics Reuse & Recycling (R2) Standard v3
This Registration is in respect to the following scope:
Downstream Vendor Management and Materials Recovery of Batteries and Handheld
Electronics

This Site Facility performs the following applicable Site Process Requirements at this location(s) and has been audited to the requirements for each
as identified.
Appendices (A)- Downstream Recycling Chain; (E)- Materials Recovery are applicable for this Single Facility.

The certification referenced above is accomplished pursuant to SEEM’s Site 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 R2 Standard is offered “AS IS” and without warranty, and any reliance otherwise, by the certificate holder or any third
party, is expressly disclaimed by SEEM. The use, display, and reference to the SEEM Certification Mark printed on this certificate is governed by
license agreement(s) entered between the certificate holder and SEEM. Certificate authenticity and validity can be verified at https://reclaimery.org.
This Registration is granted subject to the system rules governing the Registration referred to above, and the Organization hereby accounts with the
Assessment body duty to observe and comply with the said rules.

Terry Boboige, President
Perry Johnson Registrars, Inc. (PJR)
755 West Big Beaver Road, Suite 1340
Troy, Michigan 48084
(248) 358-3388

February 27, 2022 February 26, 2025 C2022-00810

The validity of this certificate is dependent upon ongoing surveillance.

Effective Date: February 27, 2022
Expiration Date: February 26, 2025
Certificate No.: C2022-00810