



EDM2010-070

**ELECTRONIC DEVICE MANUFACTURER
REGISTRATION FORM**

Registration is required under authority of Section 17303 of Part 173, Electronics, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.
FOR ADDITIONAL INFORMATION, CONTACT THE MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT,
ENVIRONMENTAL RESOURCE MANAGEMENT DIVISION,
SOLID WASTE AND LAND APPLICATION SECTION, AT 517-241-2924

Date Received by DNRE: **11/4/10**
Received by: **MF**
Fee: **\$3000** Yes No

ELECTRONIC DEVICE MANUFACTURER

1. Company Name (True Name and All Assumed Names): **Epson America, Inc.** 2. Area Code and Telephone Number: **562-290-5252**

3. Manufacturer of:
Video Display Devices Yes No
Computers Yes No
Printers Yes No

4. Mailing Address:
Address: **3840 Kilroy Airport Weay** City: **Long Beach**
State: **CA** ZIP: **90806**
Country: **USA** County (if in Michigan): **N/A**

5. Home Web Site Address: **www.epson.com**
6a. Contact name: **Ron Mateas**
6b. Contact e-mail address: **ron_mateas@ea.epson.com**
6c. Contact telephone number: **562-290-5252**

BRAND NAMES OF COVERED ELECTRONIC DEVICE(S) AND TYPE OF DEVICE (video display or computer) SOLD BY THE MANUFACTURER

7. Please list the brand names of covered devices your company manufacturers. (Attach an additional page if necessary.)

(a) Epson	(e)
(b)	(f)
(c)	(g)
(d)	(h)

For Cashiers Use Only
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TAKEBACK PROGRAM CONSUMER CONTACTS

8a. What Web site address do you provide to consumers for information on your takeback program? www.epson.com/recycle (global website) or http://www.epson.com/cgi-bin/Store/Recycle/RecycleProgram.jsp?BV_UseBVCookie=yes (for the U.S.)

8b. If provided, what telephone number do you provide to consumers for information on your takeback program? 866-917-5033

TAKEBACK PROGRAM INFORMATION

9. Please describe your takeback program.

Epson offers consumers multiple options for managing their end of life electronic equipment and consumables. We currently offer:

1. Mail Back Hardware recycling program. We will take back and recycle any Epson branded product for recycling including but not limited to printers, projectors, scanners, fax machines, all-in-one devices, computers, monitors, etc. (this program will cover devices specifically covered under the new State of Michigan Ewast Law).
2. Ink Jet Cartridge recycling program. We will take back and properly dispose of all Epson branded ink jet cartridges.
3. Toner Cartridge recycling program. We will take back and properly dispose of all Epson branded toner cartridges
4. Donation program. Partnering with the National Cristina Foundation, we offer consumers an alternative (reuse) to recycling their end of life computer equipment. Through this program, the consumer may donate products directly through the National Cristina Foundation from any brand/manufacture, not just Epson.

Epson uses FedEx as our collection and transportation partner. The end user (consumer/business) would go to the Epson website referenced above and request information on recycling their end of life electronic equipment. Epson Customer Service personnel respond to the end user with instructions on how to obtain a FedEx shipping label. This label is pre-paid and pre-address for delivery directly to Epson's recycling vendor. The end user packages up their end of life product, applies the pre-paid, pre-addressed shipping label to their package and takes it to their local FedEx location for shipment. In the event the end user cannot go to their local FedEx drop-off location due to physical limitations, they may contact FedEx for a home pick up. On our website we provide all information needed so the consumer can properly return their EOL electronics. On our website, we also provide a toll free "800" number that provides automated information along with the ability to speak with a "live person" for additional assistance.

10. What information do you provide to consumers on how and where to return covered electronic devices that are labeled with your name or brand label?

The consumer can go to our website and read the process for managing their EOL electronics. They can also contact Epson via our toll free "800" recycling information line. By calling Epson, the consumer will hear automated information on how to recycle their EOL electronics or be able to speak with a "live person" for additional assistance.

11. How do you provide information to consumers on how and where to return covered electronic devices?

On our website or via our toll free "800" recycling information line. Our information line contains automated information along with the ability to speak with a "live person" for assistance in recycling EOL electronics.

TAKEBACK PROGRAM REPORT (include this information beginning with the first registration submitted after the implementation of the takeback program)

12. The total weight of the covered electronic devices received by the takeback program from consumers during the prior year:

N/A Understand this to mean we submit a report in 2011 Tons

13. The processes and methods used to recycle or reuse the covered electronic devices received from consumers: Our recycling vendor is Sims Recycling Solutions whose parent company is a global, publicly listed Australian Company (Sims Group LTD) and the largest provider of metal processing and recycling services in the world. Epson use's multiple Sims locations in the United States but the primary location for recycling consumer hardware is located at: 417 Sanford Road, Lavergne, TN 37085. Sims Recycling Solutions guarantees zero landfill for recycled materials and Epson personnel conduct annual audit of their recycling processes including their downstream vendors. For additional information on our recycling partner please go to their website located at:

<http://www.simsmm.com/>

<http://us.simsrecycling.com/>

Recycling Process

Epson partners with a world class recycling vendor, Sims Recycling Solutions. Sims utilizes a number of processes to recycle end of life electronics. Sims conducts recycling of EOL electronics as follows:

"Firstly we have to de-pollute the ewaste - old electronics contain a mixture of hazardous substances that need to be carefully removed before the the recycling of the materials can begin. It is these problematic components that cause much of the problem when ewaste is exported to developing countries.

These pollutants include items such as mercury in the bulbs of scanners and laptops through to the various chemistries of batteries, even down to the button-cell batteries that keep the date and time on many consumer electronic products.

After de-pollution, the ewaste heads towards our automated recycling plants. Here the redundant equipment is first shredded to liberate all of the materials from each other and subsequently the small pieces are transported over a range of technologies that segregate the steel, aluminum, copper, circuit boards, plastics, glass etc. These materials are then shipped to smelters in place of primary raw materials like iron ore or bauxite.

This type of shredding and separation line, when combined with all the safety and environmental controls, costs several million dollars and can process hundreds of thousands of pounds each day. "

The Nashville (Lavergne) site not only serves the electronics recycling needs of the Southeast US, the facility also maintains a state-of-the-art near infrared plastics separator and metal sensing technologies. This equipment enables Sims to shred electronic equipment and then automatically detect and separate various types of plastics for recycling.

Personal Information/Data Destruction

Sims Recycling Solutions operates to the highest standards when it comes to data security. Their data wiping is NIST-compliant and data destruction follows the requirements of both the Department of Defense and Royal Canadian Mounted Police.

US NIST Special Publication 800-88: Guidelines for Media Sanitization

- This is the standard Sims Recycling Solutions adheres to in our hard drive wiping operations.
- This process may include overwriting not only the logical storage location of a file(s) (e.g., file allocation table) to be erased or deleted, but also the entire media including all addressable locations. The security goal of the overwriting process is to replace sensitive data with nonsensitive random data.
- Media should be overwritten a minimum of three times using a method based on the information sensitivity contained on the media.

US Department of Defense (DoD) 5220.22-M: National Industrial Security Program Operating Manual (NISPOM)

- Current editions no longer contain any references to specific sanitization methods. Standards for sanitization are left up to the Cognizant Security Authority.
- The Defense Security Service (DSS) provides a Clearing and Sanitization Matrix (C&SM) which does specify methods.
- Although the NISPOM text itself never described any specific methods for sanitization, past editions (1995 and 1997) did contain explicit sanitization methods within the DSS C&SM table inserted after Section 8-306.
- As of the Nov 2007 edition of the DSS C&SM, overwriting is no longer acceptable for sanitization of magnetic media. Only degaussing (with an NSA approved degausser) or physical destruction is acceptable.
- Sims Recycling Solutions shredding facilities all meet these requirements for physical destruction.

Royal Canadian Mounted Police (RCMP) G2-003: Hard Drive Secure Information Removal and Destruction Guidelines

- Up to A/B/Confidential data: Triple overwrite using RCMP DSX software (or equivalent)
- C/Secret/Top Secret data: Physical destruction or degaussing
- Sims Recycling Solutions is approved by the RCMP to destroy proprietary products such as hard drives and data tapes.

Sims provides Epson with a Certificate of Destruction verifying that all products along with any personal information has been destroyed.

I, the undersigned registrant, swear and affirm, UNDER PENALTY OF LAW, that the statements contained herein are true and correct. I certify under penalty of law that the information contained on this form, to the best of my knowledge and belief, is true, accurate, and complete. I am aware that there are significant penalties for submitting false information.

PRINT NAME: RONALD C. MATEAS DATE: 10/29/2010

SIGNATURE: Ronald C. Mateas TITLE: CORPORATE MANAGER, ENVIRONMENTAL PROGRAMS