EPEAT, Inc.

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LEVEL 3 INVESTIGATION PLAN – ROUND 2011-02 - September 2011

Product Verification Committee

I. PURPOSE AND CONTENTS OF THIS DOCUMENT

This plan describes the verification process to be used in the amended second EPEAT Verification Round for 2011, including the criteria that will be verified, the number of products to be verified for each criterion, and the method of verification for each.

The products and subscribers to be verified are not specifically identified. The intent is for the PVC to be blind to the specific product and subscriber about which they are making decisions. This information will be known by the staff and the Qualified Verifier, but will not be provided to the PVC until after completion of the conformance/non-conformance findings of the Round. However, when subscribers present specific information to the PVC regarding a decision, the subscriber and product will be revealed to the PVC in order to resolve any issues.

II. PRODUCT VERIFICATION COMMITTEE

Following are the members of the PVC:

Patty Dillon, Dillon Environmental Associates

Jack Geibig, Director, Center for Clean Products, University of Tennessee

Jim Arnold, Technical and Program Management Consultant, Rissa Studios

III. QUALIFIED VERIFIERS

Following are the members of the Qualified Verifier (QV) team:

Patricia Atherton
Consultant

Stephen Greene, Principal
Howland Greene Consulting

Kim Holmes
4R Sustainability

Kelley Keogh
Sin Fronteras Consulting

Carson Maxted
Consultant

Dresden Skees-Gregory
Sustainable Environmental Services

Dawn Van Seggen
Consultant

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IV. CHARACTERISTICS OF LEVEL 3 INVESTIGATION PLAN FOR ROUND 2011-02

This amended Round 2011-02 will investigate one optional criterion and pertains to notebook batteries only:

- 4.1.7.1 Optional – Batteries free of lead, cadmium, and mercury.

This Round is conducted under the revised IEEE 1680 and 1680.1 standard including the new international registry representing 41 countries. This Round resumes the suspended investigation of this criterion on previously selected products from seven subscribers chosen in Round 2011-02. Information discovered during the initial investigation pointed to the need for further investigation. A Level 3 investigation will be undertaken for the seven products previously investigated.

V. SELECTION OF PRODUCTS AND CRITERIA FOR VERIFICATION

The Level 3 investigation for Round 2011-02 will investigate one criterion, 4.1.7.1. The products involved in the Level 3 investigation are those which were chosen during the original investigation. This investigation is a follow on to Verification Round 2011-02.

Further investigation of criterion 4.1.7.1 is being undertaken due to conflicting and incomplete information delivered during the Level 1 investigation. The information provided by subscribers and available from their battery suppliers was inconsistent, and did not fully address the requirements of the criterion. Specifically, there was a question about the presence of lead as a "technically unavoidable impurity" in batteries. This Level 3 investigation will look at the entire battery pack and ascertain whether lead is a technically unavoidable impurity in notebook batteries.

A total of 7 specific investigations will be conducted as describe in the Table below. In parallel, top battery suppliers will be contact to determine whether batteries free of lead, cadmium and mercury are commercially available.

1. A snapshot was taken of the Registry prior to the original start of the Verification Round.
2. This amended Verification Round Plan lists the criterion that will be verified and the method of verification that will be used.
3. This amended Verification Round will begin directly after the PVC has approved this plan.

Possible Out-of-Sequence Selections

This Level 3 investigation is a further investigation from the Level 1 investigation started at the beginning of Verification Round 2011-02. Special circumstances have dictated that the initial investigation be suspended, and an amended investigation plan developed as a part of this Verification Round. This Plan represents the amended Verification Round Plan and is being reissued without disrupting the timing of the other verification investigations.

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VI. INVESTIGATION ASSIGNMENTS

The following Qualified Verifiers participated in the original investigation:

- Stephen Greene
- Dresden Skees-Gregory

The following Qualified Verifier will manage the follow up Level 3 investigation:

- Dawn Van Seggan

ROUND 2011-02 INVESTIGATIONS

Criterion		Verification Selection and Process	Number of Investigations
4.1.7.1	Optional - Batteries free of lead, cadmium, and mercury.	The batteries for the seven notebook products previously selected for verification are subject to further investigation. The batteries for each of the 7 notebook products will be purchased in the United States. These batteries will be sent to an analytical laboratory for testing of the specific parts in question for the presence of lead. This will be a Level 3 investigation of parts that were previously identified in the original 2011-02 Verification Round. These parts will be tested using x-ray fluorescent (XRF) technology providing an organic coating was not used to encapsulate the selected parts. Further analytical testing may be needed, but is not expected. The testing will focus specifically on any glass-pasted parts which may claim the "TECHNICALLY UNAVOIDABLE IMPURITY" EU RoHS exemption[1].	7
Total number of investigations			**7**

[1] EU RoHS exemptions are not applicable to this criterion.