



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**DATE:** See Date of Section Chief Signature Below

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
All American Recycling, Aurora, Illinois

**FROM:** Natalie Schulz, Environmental Engineer  
AECAB (MN/OH)

**THRU:** Brian Dickens, Section Chief  
AECAB (MN/OH)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** All American Recycling

**Facility Location:** 1137 Mitchell Road, Aurora, Illinois 60505

**Date of Inspection:** August 18, 2021

**EPA Inspector(s):**

1. Natalie Schulz, Environmental Engineer
2. Tess Russell, Environmental Engineer
3. Karina Kuc, Environmental Scientist

**Other Attendees:**

1. Joe Lamorte, Facility Manager (via phone)
2. Randall Sullivan, Assistant Manager

**Contact Email Address:** [jlamorte@aarecycles.com](mailto:jlamorte@aarecycles.com)

**Purpose of Inspection:** Determine compliance with safe disposal of appliances regulations at 40 C.F.R. Part 82, Subpart F

**Facility Type:** Scrap Metal Recycling Yard

**Regulations Central to Inspection:** 40 C.F.R. Part 82, Subpart F, Recycling and Emissions Reduction for the Protection of Stratospheric Ozone

**Arrival Time:** 9:10 a.m.

**Departure Time:** 9:50 a.m.

**Inspection Type:**

- Unannounced Inspection
- Announced Inspection

**OPENING CONFERENCE**

- Presented Credentials
- Stated authority and purpose of inspection
- Provided Small Business Resource Information Sheet: See document included with delivery of this report.
- Small Business Resource Information Sheet not provided.
- Provided CBI warning to facility

The following information was obtained verbally from Joe Lamorte and Randall Sullivan unless otherwise noted.

**Company Ownership:** All American Recycling owns and operates 3 additional scrap yards in Chicago, Joliet, and Ford Heights. The Aurora location opened six years ago.

**Process Description:**

All American Recycling – Aurora (the facility) accepts small appliances for recycling from the public and commercial suppliers. It does not accept cars. It does not perform refrigerant recovery at the facility, nor does it have third parties perform refrigerant recovery at the facility. These practices and policies have been in place since the facility opened.

**Staff Interview:** The facility has approximately 9 staff members. Its policy is to reject small appliances with refrigerant, but intact small appliances that are accidentally not rejected are delivered to the All American Joliet or Chicago facilities for refrigerant recovery. The delivery of intact appliances occurs when the facility has accrued enough small appliances for a full truckload, approximately once per year. The facility accepts any small appliance that does not have refrigerant, and proof of proper recovery is not required. The facility does not use verification statements for appliances; facility staff says there may be a verification statement that exists, but it is not at the facility or otherwise easily available for use by the facility. The facility does not use contracts with commercial suppliers. The facility informs customers of its refrigerant policies through its website and staff interaction with customers.

## **TOUR INFORMATION**

**EPA Tour of the Facility:** Yes

### **Data Collected and Observations:**

Inspectors viewed the scrap pile and saw multiple refrigerators in the scrap pile. Inspectors observed a separate area near the scrap pile where approximately one dozen intact air conditioners were laying; staff told inspectors that these small appliances would be brought to other scrap yards owned by All American for refrigerant recovery.

No signage communicating the facility's refrigerant policy was observed during the inspection.

**Photos and/or Videos:** were taken during the inspection.

A photo log is contained in Appendix A.

**Field Measurements:** were not taken during this inspection.

## **CLOSING CONFERENCE**

Provided U.S. EPA point of contact to the facility


### **Requested documents:**

- Copy of training material regarding rejection and acceptance of appliances and/or refrigerant policy implementation;
- Verification statement or other document that attests to the status of refrigerants in appliances at the time of sale to the facility;
- Documentation of all deliveries of intact refrigerant-containing appliances to the facilities in Chicago and Joliet;
- Scale tickets for appliances and compressors; and,
- Description and/or example of how the facility communicates its refrigerant policies to the customers.


**Compliance Assistance:** Inspectors informed All American Recycling that EPA expects scrap metal recyclers to have verification statements that attest to the proper recovery of refrigerants from small appliances on-hand. Inspectors informed All American Recycling that the regulations regarding refrigerant recovery from appliances could be found at 40 C.F.R. Part 82, Subpart F.

**Concerns:** Inspectors stated their concern over the lack of verification statements at the facility. Inspectors also stated their concern that the intact small appliances were not being handled with care, increasing the risk of refrigerant leaks.

**DIGITAL SIGNATURES**

Report Author: **Schulz,  
Natalie**  Digitally signed by Schulz,  
Natalie  
Date: 2021.09.20  
11:12:03 -05'00'

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Section Chief: **Brian  
Dickens**  Digitally signed by Brian  
Dickens  
Date: 2021.09.20  
11:37:35 -05'00'

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**APPENDICES AND ATTACHMENTS**

- 1.* Photo Log

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**APPENDIX A: DIGITAL IMAGE LOG**

<p><b>1. Inspector Name:</b> Karina Kuc</p>	<p><b>2. Archival Record Location:</b>  C:\Users\nschulz\OneDrive - Environmental Protection Agency (EPA)\Aurora Scrap Yards\All American</p>
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_7240.JPG	August 18, 2021 9:27 a.m.	Air conditioner in segregated pile.
2	IMG_7241.JPG	August 18, 2021 9:27 a.m.	Air conditioner in segregated pile.
3	IMG_7242.JPG	August 18, 2021 9:28 a.m.	Pile of segregated air conditioners near scrap pile.
4	IMG_7243.JPG	August 18, 2021 9:28 a.m.	Air conditioner in segregated pile.
5	IMG_7244.JPG	August 18, 2021 9:29 a.m.	Pile of segregated air conditioners near scrap pile.
6	IMG_7245.JPG	August 18, 2021 9:32 a.m.	Scrap pile.