



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

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Total Reclaim, Kent, WA

FROM: Daniel Heins, Environmental Scientist
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Total Reclaim

Facility Location: 7021 S 220th Street, Kent, WA

Date of Inspection: August 2, 2022

EPA Inspector(s):

1. Daniel Heins, Environmental Scientist

Other Attendees:

1. Jesse McCullough, Compliance Manager – Total Reclaim (via phone for opening/closing conferences)
2. Cameron O'Brien, Production Manager – Total Reclaim
3. Pierre Hale, HVAC Supervisor – Total Reclaim

Contact Email Address: jesse@totalreclaim.com

Purpose of Inspection: Ozone depleting substances/refrigerants compliance inspection

Facility Type: Appliance and electronic waste recycling center

Regulations Central to Inspection: 40 CFR Part 82 Subpart F

Arrival Time: 10:10

Departure Time: 11:05

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet (via email)
- ☐ Small Business Resource Information Sheet not provided.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Total Reclaim representatives unless otherwise noted.

Process Description:

Total Reclaim's Kent location ("the Facility") receives various specialty consumer wastes for recycling. The Facility's operations can be roughly split into electronics recycling and appliance/refrigerant recycling.

Members of the public and larger customers (such as waste transfer stations) pay Total Reclaim to dispose of appliances containing refrigerants at the Facility. When there are enough of one type of appliance to process as a batch, Facility technicians go through their stock of that appliance type, identify the type of refrigerant used in each appliance, and recover the refrigerant with a recovery device. Large appliances as defined under Subpart F are only handled by certified technicians, while any of their technicians may use their certified equipment to recover refrigerant from small appliances. The Facility uses the recovery devices to fill tanks with single refrigerant types, and when these tanks are full they are moved over to the refrigerant handling side of the operations. The Facility does not remove refrigerants from motor vehicle air conditioners (MVACs) but will recover residual refrigerant from "auto cans" used elsewhere to supply MVACs with refrigerant.

The Facility also receives filled tanks of refrigerants from customers that do their own recovery such as scrap yards and return emptied tanks to these customers. Technicians takes the full tanks of recovered refrigerant (whether recovered in-house or by a customer) and tests the quality of their contents. Based on the quality of the recovered gas, the contents are transferred to various larger refrigerant tanks. When full, the large refrigerant tanks are sent off either to their Portland location or to third party companies for reclamation.

The Facility also serves as a warehouse for tanks of refrigerant to be sold to customers.

Staff Interview:

Total Reclaim owns and operates a handful of other locations. Their Portland location is the only facility that refrigerant reclamation currently occurs at, with other sites only performing recovery

for refrigerants. Total Reclaim technicians will do refrigerant recycling (filtering/cleaning and directly re-adding the refrigerant to the appliance) for customers at customer facilities, including servicing ships for seafood companies. Total Reclaim plans on beginning reclamation operations at the Kent Facility by the end of the year, pending approval of their closure plan by Washington State Department of Ecology. The Portland location only intermittently performs reclamation on an as-need basis, bringing down technicians that normally report to the Kent location.

Jesse McCullough stated that Total Reclaim is looking into joining the EPA Responsible Appliance Disposal (RAD) program to start recovering appliance foam and other wastes as part of disposal at the Facility, pending possible support from local government partners.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

Daniel Heins was guided through the Facility by Cameron O'Brien. Daniel Heins observed the refrigerant recovery process, at the time being done on a batch of air conditioners. Moving from the appliance side to the refrigerants side, Pierre Hale joined and pointed out the various tanks ready for testing and the large refrigerant storage tanks being filled in preparation to be sent for reclamation off-site.

Photos and/or Videos: were taken during the inspection. See Appendix A.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

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

Requested documents:

- Certification information for the reclamation units at the Facility

DIGITAL SIGNATURES

Report Author: DANIEL HEINS  Digitally signed by DANIEL HEINS
Date: 2022.08.03 16:16:45 -07'00'

Section Supervisor: Frank, Nathan  Digitally signed by Frank, Nathan
Date: 2022.08.04 16:34:18 -05'00'

Facility Name: Total Reclaim

Facility Location: 7021 S 220th St, Kent, WA

Date of Inspection: August 2, 2022

APPENDICES AND ATTACHMENTS

Appendix A: Digital Image Log

Facility Name: Total Reclaim
Facility Location: 7021 S 220th St, Kent, WA
Date of Inspection: August 2, 2022

APPENDIX A: DIGITAL IMAGE LOG

Inspector Name: Daniel Heins	1. Archival Record Location: EPA R5 Electronic Records Center
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Image Number	File Name	Date/Time (PDT)	Description of Image
1	DSC02407.jpg	2022-08-02 11:12	Facility entrance
2	DSC02408.jpg	2022-08-02 11:45	Refrigerant recovery device hooked up to small appliance