

	<b>Auditing Document</b>	
	<b>AD-18 WA State Recycling Program Audit Summary</b>	
	Revision Date: 05/29/2025	Revision #: 1.0

## Scope/Site Information

<b>Customer Name:</b>	<b>Total Reclaim</b>
<b>Customer Contact:</b>	Arnold Diep
<b>Address:</b>	7021 S 220th Street Kent, WA 98032
<b>Audit Standard(s):</b>	WAC 173-900-650
<b>EPA ID #:</b>	WAH000056160
<b>Audit Date(s):</b>	July 16-18 2025
<b>Employee Count:</b>	35
<b>Auditor:</b>	Stephen Lefon
<b>Auditor Qualifications:</b>	Stephen Lefon is an ISO 9001, ISO 14001, ISO 45001, RIOS, and R2 auditor. Approved by the State of WA to complete WAC 173-900-650 audits.
<b>Scope of Audit:</b>	<p>This audit was conducted to meet the specific requirements of the State of Washington’s “Environmentally Sound Management Performance Measures for Direct Processors – Preferred Status” qualification requirements. The WA State Standards, WAC 173-900-650.</p> <p>The audit includes an interviews, observations, and records reviews with the facility Environmental Health and Safety Manager, and employees. The internal audit of the RIOS:2016 and R2V3 system was conducted at the same time.</p>

## Overview

The purpose of the audit was to verify that the management system as described in the management system procedures conforms to the requirements of the QEH&S Management System and Standards listed above have been implemented as planned. In addition, legal requirements were also assessed to verify that the facility is meeting applicable laws. This audit was conducted using sampling methods and other standard audit procedures. As such, while every effort has been made to ensure accuracy and reliability, the audit does not provide absolute assurance that all instances of non-compliance, errors, or irregularities were identified. There remains a possibility that some items may not have been detected.

If the procedure or standard requirements are not followed, non-conformances are raised. The Internal Audit is an integral part of the Plan – Do – Check – Adjust cycle of continual improvement. The audit activities included the interview of various company personnel, observations of activities related to the management system, and the review of documents and records.

## Areas Audited

<b>Processes Audited:</b>	<input checked="" type="checkbox"/> Shipping Receiving <input checked="" type="checkbox"/> Data Destruction/Security <input checked="" type="checkbox"/> Throughput <input checked="" type="checkbox"/> Refurbishment <input checked="" type="checkbox"/> Resale	<input checked="" type="checkbox"/> Triage <input checked="" type="checkbox"/> Admin <input checked="" type="checkbox"/> De-manufacturing <input checked="" type="checkbox"/> Transportation <input checked="" type="checkbox"/> Vendor Qualifications
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## Audit Findings

<b>Summary of Findings:</b>	No current findings of non-compliance were found at this site audit. Audits reports that details specific areas reviewed and objective evidence were presented to Total Reclaim and are available upon request. Below is a summary of findings per section reviewed.
<b>Nonconformance Found:</b>	<b>0</b>
<b>Opportunities for Improvement found:</b>	Discussed some improvement ideas at closing meeting.

## Summary of Findings

Washington State Preferred Performance Measures for WAC 173-900-650 Summary		
Section #	Title	Found in Compliance
1	Responsible Management Priorities	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Summary:</b> The Facility Maintains the Quality Environmental Management System Manual Section 10 – addresses continuous improvement through management and operational evaluations. The 7021 S 220th St, Kent, WA 98032.		
Section #	Title	Found in Compliance
2	Legal Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Summary:</b> The Facilities currently maintain good compliance with legal requirements pertaining to their operations. 3 Non-Conformances 's were found and have been addressed/corrected with corrective actions. Permits and plans are in conformity with actual operations, which were reviewed and confirmed during the original site visit. The facility conducts audits of their downstream vendors to R2V3 requirements. Permits and written plans conformity with actual operations were reviewed and confirmed during site visit.		
Section #	Title	Found in Compliance
3	EHS Management Systems	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Summary:</b> Facility is certified to RIOS. Recycling Industry Operating Standard (RIOS) is created specifically for the recycling industry. It integrates generally accepted practices of management systems focused on Quality, Environmental, and Health & Safety management (QEH&S). This allows for more straightforward language and requirements specific to recycling.		



## Auditing Document

**AD-18 WA State Recycling Program Audit Summary**

Revision Date: 05/29/2025

Revision #: 1.0

### Washington State Preferred Performance Measures for WAC 173-900-650 Summary

The RIOS management system includes plans to assure product quality of recyclable materials and reusable equipment, environmental protection from recycling activities, and health and safety to protect workers and the community. Predicated on an approach of risk-based management, the RIOS management system is intended to proactively manage these elements. The approach is focused on planning for risks, implementing controls, and monitoring and measuring performance to achieve managed levels of acceptable risk and continuous improvement. The company wide QEHSMS is audited and updated, as new procedures are implemented, or as new materials are accepted. The EHSMS contains a diligent “Plan, Do, Check” component, which manages change and issues through constant management review. The system is 3rd party reviewed annually during surveillance audits required by these certifications.

Section #	Title	Found in Compliance
4	Recordkeeping	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**

Reviewed the Document and Record Control Procedure. Documents and records included in the QEH&S management system are listed on the Master Document List and Records Management Table.

Records are controlled according to the Document and Record Control Procedure. Records are listed on the Records Management Table. Records are kept for three to five years, except for H&S records which are kept for 30 years after employment. All requested records were available unless otherwise noted.

Section #	Title	Found in Compliance
5	On-Site Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**

Material is handled, packaged, and stored in compliance with the standard. Worker safety is protected through engineering controls and was observed by auditor. Workers wear and maintain PPE. The health and Safety training is consistent with requirements for the operation and the facility has systems in place to ensure employee comprehension. IH Monitoring and medical reviews are conducted in 2025. TRI is pro-active regarding new processes and appropriate testing is conducted as implementation begins.

Reviewed IH air monitoring completed by University of Washington Field and Research Group in March and April 2025. Samples were taken from employees in the following work areas: HVAC and refrigerant teardown, Shredder Operator, Battery Line Operator, and Forklift Operator. All air samples were below the permissible exposure limit for TRI.

Reviewed Noise Monitoring conducted by Washington Audiology Services inc. on 6-2-21. The monitoring was taken with three static meters all three of which read over 85 db. A Hearing Conservation Program is required for the Shredder and Logger operators. It was recommended that the entire warehouse be under a hearing conservation program. Annual Audiometric tests were completed 06/06/2025 by Washington Audiology Services. Annual employee hearing tests were found completed.



## Auditing Document

AD-18 WA State Recycling Program Audit Summary

Revision Date: 05/29/2025

Revision #: 1.0

### Washington State Preferred Performance Measures for WAC 173-900-650 Summary

Reviewed scale calibration for scales. Calibration was performed by Cheyanne Scale Company.

Section #	Title	Found in Compliance
6	Materials of Concern	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**

The auditor observed Materials of Concern (MOC) being handled in accordance with standards. A MOC flow chart is attached. The auditor verified that all downstream vendors for MOC's handle material per the WA State DOE Standards. Total Reclaim agrees to notify the WA State DOE of vendor changes for all MOC's and has built this into their QEHSMS.

Section #	Title	Found in Compliance
7	Recycling	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**

Materials managed to ANSI and OSHA standards - observed during site visit. Auditor observed dismantling and separation to marketable levels for the best use and highest grade of recycling and a very clean and efficient warehouse processing areas.

Section #	Title	Found in Compliance
8	Reuse	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**

The reuse and refurbish department meet all the WA State Processor requirements as well. Auditor observed complaint practices during audit.

Section #	Title	Found in Compliance
9	Disposal of Residuals	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**

Facility waste management follows state and federal guidelines as observed by auditor. No materials of concern go to landfill or incineration. Waste is managed and separated to minimize material going to landfill.

Section #	Title	Found in Compliance
10	Refurbishment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**

TRI has a reuse and testing department. Auditor observed WipeOS, to test and erase hard drives, cell phones, desktops, and laptops. Reviewed sales orders and all orders reviewed had testing records for items sold in Material Tracking System.

Section #	Title	Found in Compliance
11	Transport	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



## Auditing Document

AD-18 WA State Recycling Program Audit Summary

Revision Date: 05/29/2025

Revision #: 1.0

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**Summary:**

Auditor observed appropriate packaging and labeling of all material. Facility uses company drivers for most transportation - trains online in DOT procedures - contracts with, WasteXpress, FedEx, and other DOT permitted transporters.

Section #	Title	Found in Compliance
12	Prison Labor	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**

TRI does not use prison labor.

Section #	Title	Found in Compliance
13	Facility Access	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**

TRI allows WA DOE full record and site access (auditor discussed with management team).

Section #	Title	Found in Compliance
14	Notification of Violations and Penalties	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**

TRI agrees to notify WA State DOE of any violations or penalties incurred on behalf of operations within 30 days of notification.

Section #	Title	Found in Compliance
15	Downstream Due Diligence	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**

CRT Glass and Plastics – [REDACTED], they certified to e-Stewards, and R2V3.  
Circuit Boards – [REDACTED], they are certified to R2V3.  
Batteries (all chemistries but lead acid) - [REDACTED], they are certified to R2V3.  
Batteries (lead acid) – [REDACTED].  
Circuit Boards – [REDACTED], all certified to R2v3. See attached Material of Concern Chart.

Section #	Title	Found in Compliance
16	Exporting	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**

Reviewed the Import Export Requirements Summary List, which shows all focus material is sent to R2V3 certified companies and therefore exports do not need to be tracked to final destination.

Section #	Title	Found in Compliance
17	Insurance	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**

TRI maintains more than adequate insurance to cover their employees, operations, and pollution liability. The facility holds the following insurances, which are valid through 7/01/2026.



**Auditing Document**

**AD-18 WA State Recycling Program Audit Summary**

Revision Date: 05/29/2025

Revision #: 1.0

**Washington State Preferred Performance Measures for WAC 173-900-650 Summary**

General Liability: \$1,000,000 per occurrence / \$2,000,000 aggregate Automobile Liability: \$1,000,000 Combined Single Limit  
 Excess Liability: \$5,000,000 per occurrence / \$5,000,000 aggregate Workers Compensation: \$1,000,000 each/ \$1,000,000 disease Pollution Liability: \$5,000,000, \$25,000 deductible  
 Cyber Liability: \$1M Crime: \$100K

Section #	Title	Found in Compliance
18	Closure	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**  
 Reviewed E-waste Recycling Facility Closure Plan-v3.0 with Closure Cost Estimate Total Reclaim received quotes from URT and WasteXpress to dispose of any CEPs that the facility cannot process at the time of closure and to implement and certify this Closure Plan. The closure cost is estimated to be \$21,245.95. The closure cost estimate will be adjusted annually for inflation as specified in WAC 173-303-620(3)(c)(i) and (ii). Costs for closure labor, equipment, and analytical services are based on currently available rates. Total Reclaim will meet the financial assurance requirements specified under WAC 173-303-620(8) through liability insurance issued by Acord.

Review Refrigerant Reclaim Closure Plan\_v3.0 with Closure Cost Estimate. Total Reclaim received quotes from Ingenium, WasteXpress, and Trinity Consultants to dispose of any refrigerant inventory present at the time of closure and to implement and certify this Closure Plan. The estimated closure cost is \$54,470.00. Total Reclaim uses a Standby Letter of Credit (LOC) as its financial assurance mechanism for closure. Total Reclaim meets the financial assurance requirements specified under WAC 173-303-620(8) through liability insurance issued by Acord.

Section #	Title	Found in Compliance
19	Facility Security	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Summary:**  
 TRI uses alarm systems that is monitored 24/7 by a third party. Visitors sign in and are escorted onsite. Managers have access to the building. Keys are used to access Asset Management Department's and storage trailers. Facility has 10 cameras with recordings stored on a DVR for at least 90 days.