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CLIENT/MATTER NUMBER
110874-0103

July 26, 2017

Via E-Mail & FedEx

United States Environmental Protection Agency-Region 5
Attn: Brenda Whitney
77 West Jackson Boulevard, LR-17J
Chicago, IL 60604
Whitney.Brenda@epa.gov

Re: Response to Request to Provide Information Pursuant to Resource Conservation Recovery Act Dated June 28, 2017-Container Life Cycle Management LLC

Dear Ms. Whitney:

On July 5, 2017, Foley & Lardner LLP received a Resource Conservation Recovery Act Section 3007 Information Request directed to "Container Life Cycle Management, Inc. (d/b/a Mid-America Steel Drum)" from the United States Environmental Protection Agency-Region 5 ("U.S. EPA") dated June 28, 2017. It is Container Life Cycle Management LLC's ("CLCM's") intent to respond promptly based on the available information; however, providing responses to the Information Request requires locating and reviewing a large volume of documents. CLCM appreciates U.S. EPA's flexibility in granting an extension of the deadline to fully respond to the Information Request.

As agreed, CLCM has completed its responses to Requests 1, 2, 3(a), 4-7, 8(d)-(e), 9, 10(a)-(b), 11, 13(d)-(g), 14-19, 20(d)-(g), and 21. As agreed, CLCM will provide its response to Request 12 on or before August 9, 2017, and its responses to Requests 3(b)-(d), 8(a)-(c), 10(c)-(d), 13(a)-(c), and 20(a)-(c) to U.S. EPA by September 11, 2017.

Documents responsive to this request are provided as PDF files on the flash drive which will be arriving via FedEx, with a corresponding Table of Contents as requested. The documents have been scanned for viruses using Workshare Professional.

Sincerely,

Linda E. Benfield

Enclosures (via FedEx only)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

RESPONSE OF
CONTAINER LIFE CYCLE MANAGEMENT LLC TO
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY'S
REQUEST TO PROVIDE INFORMATION UNDER SECTION 3007 OF THE
RESOURCE CONSERVATION RECOVERY ACT

July 26, 2017

Foley & Lardner LLP received the United States Environmental Protection Agency's ("U.S. EPA") Resource Conservation Recovery Act, Section 3007 Information Request dated June 28, 2017 ("Information Request") directed to "Container Life Cycle Management, Inc. (d/b/a Mid-America Steel Drum)" regarding the facilities at 2300 W. Cornell St. Milwaukee, Wisconsin, 8570 S. Chicago Ave. Oak Creek, Wisconsin, and 3950 South Pennsylvania Avenue St. Francis, Wisconsin (hereinafter referred to as the "Facilities"). Container Life Cycle Management LLC ("CLCM") is a joint venture that purchased the operating assets of the business on November 4, 2013, currently operates the Facilities.

Foley & Lardner LLP received the Information Request on July 5, 2017. As agreed, this document includes CLCM's responses to Requests 1, 2, 3(a), 4-7, 8(d)-(e), 9, 10(a)-(b), 11, 13(d)-(g), 14-19, 20(d)-(g), and 21. As agreed, CLCM will provide its response to Request 12 on or before August 9, 2017, and its responses to Requests 3(b)-(d), 8(a)-(c), 10(c)-(d), 13(a)-(c), and 20(a)-(c) to U.S. EPA by September 11, 2017.

GENERAL OBJECTIONS

CLCM's objections are made without in any way waiving or intending to waive but, on the contrary, preserving and intending to preserve:

(a) all questions and/or objections as to competency, relevancy, materiality, privilege, and admissibility as evidence for any purpose of the responses or subject matter thereof, in any subsequent proceeding involving CLCM;

(b) the right to object on any ground to the use of these responses or the subject matter thereof in any subsequent proceeding involving CLCM; and

(c) the right to object on any ground at any time to other requests or discovery procedures involving or relating to the subject of these responses.

These responses are based on, and therefore necessarily limited by, the records and information still in existence, presently recollected, and thus far discovered in the course of preparing these responses. CLCM reserves the right to supplement and make any changes to these responses if it appears at any time that omissions or errors have been made or that more accurate information is available.

CLCM objects to each and every instruction and request to the extent that it seeks information that is not relevant or otherwise beyond that authorized by the Resource Conservation and Recovery Act.

CLCM objects to each and every instruction and request to the extent that it seeks information protected by the attorney/client privilege, the attorney work product doctrine, or any other applicable privilege or restriction, and CLCM has not included in this response copies of any such documents protected by such privileges, doctrines, or restrictions.

CLCM objects to each and every request to the extent that such requests are overly broad and unduly burdensome.

CLCM objects to this Information Request to the extent it lacks any definitions for the terminology utilized in the requests, such that CLCM is unable to determine what information is being sought by U.S. EPA. Nothing in this response or in any subsequent or previous response to the Information Request shall be considered or deemed to be a waiver of these objections.

The following responses correspond to the numbered requests within the Information Request (the Information Request language is set forth in italics). All responses were prepared with the assistance and advice of counsel and such discussions are covered by attorney/client and attorney work product privileges.

RESPONSE

REQUEST NO. 1. *Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified, business telephone number for each individual identified, and the number of years that each identified individual has worked for or at CLCM.*

Response No. 1. The following individuals provided information used or considered in this Response or were otherwise consulted in the preparation of this Response. Mark Furgason and Kevin Meyer have been employed by CLCM since CLCM began operating the Facilities in November 2013. Lauren Laabs and Joel Lueking are outside consultants for the Facilities.

Mark Furgason
Plant Manager- St. Francis
(414) 762-1114

Kevin Meyer
Plant Manager- Cornell and Oak Creek
(414) 762-1114

Lauren Laabs
Principal Consultant- Mostardi Platt
(630) 993-2116

Joel Lueking
Principal Consultant- Mostardi Platt
(630) 993-2116

Cornell Street Facility

REQUEST NO. 2. *Provide a schematic diagram of the facility, depicting the overall process.*

Response No. 2. A schematic diagram of the facility, depicting the overall process is enclosed with this Response and is labeled as document Bates No. CLCM-RCRA-Q2-000001.

REQUEST NO. 3. *Provide a narrative description of the business activities at this facility. Please include the following information:*

(a) The services CLCM provides its customers that provide it with drums and/or totes at Cornell Street;

Response No. 3(a).

A narrative description of certain business activities at the Cornell Street facility is enclosed with this response and is labeled as document Bates No. CLCM-RCRA-Q3(a)-000001.

REQUEST NO. 4. *Provide copies of each Standard Operating Procedure that addresses each of the following concepts at the Cornell Street facility:*

(a) The receipt of shipments of incoming containers, including, but not limited to the following information:

i. Whether the shipment is transported by CLCM or by the vendor;

ii. The length of time a vendor may remain at Cornell Street before departing;

iii. Specific time constraints for when a container is determined to be "empty," as that term is defined in Wisconsin Administrative Code § NR 661.01(2) [40 C.F.R. § 261.7(b)]; and

iv. The length of time an unmanned trailer may remain on the premises before the load is evaluated.

(b) The process for determining if an incoming container is empty.

(c) The management of containers that are not empty, including, but not limited to the following information,

i. Whether there is a tracking system that is used to relate the non-empty container with the original vendor. If so, what is the tracking system;

ii. The length of time that a non-empty container may remain at Cornell Street;

iii. The markings and labels that are used by CLCM employees on the containers;

iv. Any protections that are provided for the containers to prevent damage or spills due to weather, poor container condition, vandalism, etc.; and

v. Inspections conducted in the area.

(d) The addition of water to containers that contain acids or bases to adjust the pH prior to container washing, and the disposition of the diluted material;

(e) The removal of containers that have been determined to be not empty, including but not limited to the following information,

i. The transporter used for the removal;

ii. The shipping documents that are sent with the removed containers;

iii. The charges that are applied to the vendor for removal;

iv. The destination(s) of the removed containers; and,

v. The length of time that a container may remain at Cornell Street before the container is removed.

Response No. 4. Please see below for the procedures employed by the Cornell Street facility in a narrative format and as currently described and communicated to employees in on-the-job training.

(a) (i) Shipments are transported by customers, customer vendors, and CLCM.

(ii) Vendors are limited to a maximum of two hours onsite before departing.

(iii) The facility determines whether containers are empty during unloading from delivery truck trailers. Unloading times vary based on load size.

(iv) An unmanned trailer may remain onsite for a maximum of two hours prior to being evaluated.

(b) Employees are trained to identify potential non-empty containers for closer evaluation. The initial empty container evaluation process includes physical handling and visual assessment.

(c)(i) The tracking system for non-empty containers includes affixing reject labels on each container that include a tracking number. A bill of lading referencing the tracking number is then prepared and shipped with the containers back to the customer.

(ii) Non-empty containers typically remain onsite for approximately one day and up to two weeks. Customers are immediately notified when non-empty containers are identified. In some instances, non-empty containers are rejected before the trailer is unloaded.

(iii) A reject label indicating the container is not empty is affixed to each container.

(iv) All non-empty containers are stored inside the facility building.

(v) Visual inspections of the non-empty containers are performed daily.

(d) When necessary, incoming containers are rinsed with water for the purpose of cleaning the containers and removing container residues. No water is added for the purpose of adjusting pH. The rinse water is collected for offsite disposal.

(e)(i) The non-empty container transporters include customers and customer vendors. CLCM does not transport the non-empty containers that it identifies during the evaluation process back to customers.

(ii) The non-empty container return shipping papers include bills of lading.

(iii) The charge applied for each non-empty container is $75.

(iv) The non-empty containers are transported back to the customers by customers and customer vendors.

(v) Typically, non-empty containers are removed from the facility within one week to two weeks.

REQUEST NO. 5. *For the Cornell Street "Cut and Scrape" operation, provide information including, but not limited to, the following:*

(a) A description of the operation;

(b) Dates of operation;

(c) Waste determinations; and,

(d) Shipping records for the off-site shipments of the residuals generated from the operation.

Response No. 5. The "Cut and Scrape" operation is no longer performed at the Cornell Street facility.

REQUEST NO. 6. *For the "Shop Vacuum Residual Removal" operation, provide information including, but not limited to, the following:*

(a) A description of the operation;

(b) Dates of operation;

(c) Waste determinations; and,

(d) Shipping records for off-site shipments of the residuals generated from the operation.

Response No. 6.

(a) When necessary, containers that previously held a non-hazardous material are vacuumed if residue is present.

(b) The "Shop Vacuum Residual Removal" operation has been conducted at the Cornell Street facility at all times covered by this Information Request.

(c) All waste determinations for the Cornell Street facility for the time period covered by the Information Request are enclosed with this response and are labeled as documents Bates No. CLCM-RCRA-Q6(c)-000001 to CLCM-RCRA-Q6(c)-000006.

(d) All waste shipping records for the Cornell Street facility for the time period covered by the Information Request are enclosed with this response and are labeled as documents Bates No. CLCM-RCRA-Q6(d)-000001 to CLCM-RCRA-Q6(d)-000020.

REQUEST NO. 7. *For the "Container Washing" operation, provide information including, but not limited to, the following:*

(a) A description of the operation including the purpose of the initial flush tank and the larger wash tanks, information regarding the pH adjustment of the wash water, and the generation of residuals from the tanks or filters;

(b) Dates of operation;

(c) Waste determinations; and,

(d) Shipping records for residuals generated from the initial flush tank, the larger tanks, and the filter paper.

Response No. 7.

(a) Information responsive to this request is enclosed with this response and included within the document labeled Bates No. CLCM-RCRA-Q7(a)-000001.

(b) The "Container Washing" operation has been conducted at the Cornell Street facility at all times covered by this Information Request.

(c) Please see documents labeled Bates No. CLCM-RCRA-Q6(c)-000001 to CLCM-RCRA-Q6(c)-000006 for all waste determinations for the Cornell Street facility including the determinations for the Shop Vacuum Residual Removal process and the Container Washing Process.

(d) Please see documents labeled Bates No. CLCM-RCRA-Q6(d)-000001 to CLCM-RCRA-Q6(d)-000020 for all waste shipping documents for the Cornell Street facility including the documents for the Shop Vacuum Residual Removal process and the Container Washing Process.

REQUEST NO. 8. *Provide copies of the following records as they pertain to the Cornell Street Facility, as applicable:*

(d) A current inventory of containers in storage (e.g., in trailers) awaiting evaluation for processing at the Cornell Street facility; and,

(e) A current inventory of containers in storage that have been determined to be not empty and will be returned to the vendor.

Response No. 8.

(d) Approximately 1,500 containers were onsite in trailers at the Cornell Street facility awaiting evaluation for processing as of July 18, 2017.

(e) There were no containers onsite at the Cornell Street facility that had been identified as non-empty as of July 18, 2017.

St. Francis Facility

REQUEST NO. 9. *Provide a schematic diagram of the facility, depicting the overall process.*

Response No. 9. Process schematic diagrams of the facility, depicting the overall processes are enclosed with this Response and is labeled as document Bates No. CLCM-RCRA-Q9-000001 to CLCM-RCRA-Q9-000002.

REQUEST NO. 10. *Provide a narrative description of the business activities at this facility. Please include the following information:*

(a) The services CLCM provides its customers that provide it with drums and/or totes at St. Francis;

(b) The number of customers that provide it with drums and/or totes currently contracted with St. Francis;

Response No. 10.

(a) A narrative description of certain business activities at the St. Francis facility is enclosed with this response and is labeled as document Bates No. CLCM-RCRA-Q10(a)-000001.

(b) The number of customers currently contracted with the St. Francis facility is approximately 274. The St. Francis facility does not process totes and only processes steel and plastic RCRA-empty drums.

REQUEST NO. 11. *Inasmuch as these documents were not provided in your response to item 4, above, provide copies of each Standard Operating Procedure that addresses each of the following concepts at the St. Francis Facility:*

(a) The receipt of shipments of incoming containers, including, but not limited to the following information:

i. Whether the shipment is transported by CLCM or by the vendor;

ii. The length of time a vendor may remain at St Francis before departing;

iii. Specific time constraints for when a non-empty determination is to be made; and

iv. The length of time an unmanned trailer may remain on the premises before the load is evaluated.

(b) The process for determining if an incoming container is empty.

(c) The management of containers that are not empty, including, but not limited to the following information:

i. Whether there is a tracking system that is used to relate the non-empty container with the original vendor. If so, what is the tracking system;

ii. The length of time that a non-empty container may remain at St. Francis;

iii. The markings and labels that are used by CLCM employees on the containers;

iv. Any protections that are provided for the containers to prevent damage or spills due to weather, poor container condition, vandalism, etc.; and

v. Inspections conducted in the area.

(d) The removal of containers that have been determined to be not empty, including but not limited to the following information:

i. The transporter used for the removal;

ii. The shipping documents that are sent with the removed containers;

iii. The charges that are applied to the vendor for removal;

iv. The destination(s) of the removed containers; and

v. The length of time that a container may remain at St. Francis before the containers are removed.

Response No. 11. Please see below for the procedures employed by the St. Francis facility in a narrative format and as currently described and communicated to employees in on-the-job training.

(a)(i) Shipments are transported by customers, customer vendors, and CLCM.

(ii) Vendors are limited to a maximum of two hours onsite before departing.

(iii) The facility determines whether containers are empty during unloading from delivery truck trailers. Unloading times vary based on load size and drum type.

(iv) An unmanned trailer may remain onsite for as little as a few hours to over a month.

(b) Employees are trained to identify potential non-empty containers for closer evaluation. The initial empty container evaluation process includes physical handling and visual assessment.

(c)(i) The tracking system for non-empty containers includes affixing reject labels on each container that include a tracking number. A bill of lading referencing the tracking number is then prepared and shipped with the containers back to the customer.

(ii) Non-empty containers typically remain onsite for approximately one day and up to several days. In some instances, non-empty containers are rejected before the trailer is unloaded.

(iii) A reject label indicating the container is not empty is affixed to each container.

(iv) All non-empty containers are stored on a covered truck dock.

(v) Visual inspections of the non-empty containers are performed daily.

(d)(i) The non-empty container transporters include customers and customer vendors. CLCM does not transport the non-empty containers that it identifies during the evaluation process back to customers.

(ii) The non-empty container return shipping papers include bills of lading.

(iii) The charge applied for each non-empty container is $75.

(iv) The non-empty containers are transported back to the respective customer by customers and customer vendors.

(v) Typically, non-empty containers are removed from the facility within one day to one week. Customers are immediately notified when non-empty containers are identified.

REQUEST NO. 13. *Provide true, accurate, and complete copies of the following records as they pertain to the St. Francis facility, as applicable:*

(d) A current inventory of containers in storage (e.g., in trailers) awaiting evaluation for processing at the St. Francis facility;

(e) A current inventory of containers in storage that have been determined to be not empty and will be returned to the vendor;

(f) Shipping records for outgoing wastes that are typically generated at St. Francis, including, but not limited to the following waste streams, if applicable:

i. Wash water tank bottoms from cleanouts;

ii. Untreated wash water;

iii. Spent blast media;

iv. Spent bag house filters;

v. Spent paint booth filters;

vi. Paint-related wastes, except for paint booth filters;

vii. Oil skimmed from the wash tanks;

viii. Filter cake (sludge) generated from wastewater treatment;

ix. Spent carbon from the wastewater treatment unit;

x. Spent scrubber media; and,

xi. Wastes co-mingled from incoming vendor containers into common collection containers.

(g) Documentation of waste determinations for each of the wastes generated at the St. Francis facility, including, but not limited to those wastes identified in item 13.f, above.

Response No. 13.

(d) Approximately 5,000 containers were onsite in trailers at the St. Francis facility awaiting evaluation for processing as of July 21, 2017.

(e) There were 90 containers that had been identified as non-empty onsite at the St. Francis facility as of July 17, 2017.

(f) All waste shipping documents for the St. Francis facility for the time period covered by the Information Request are enclosed with this response and are labeled as documents Bates No. CLCM-RCRA-Q13(f)-000001 to CLCM-RCRA-Q13(f)-000014.

(g) All waste determinations for the St. Francis facility for the time period covered by the Information Request are enclosed with this response and are labeled as documents Bates No. CLCM-RCRA-Q13(g)-000001 to CLCM-RCRA-Q13(g)-000004.

Oak Creek Facility

REQUEST NO. 14. *Provide a schematic diagram of the facility, depicting the overall process.*

Response No. 14. A schematic diagram of the facility, depicting the overall process is enclosed with this Response and is labeled as document Bates No. CLCM-RCRA-Q14-000001.

REQUEST NO. 15. *Provide a narrative description of the business activities at this facility. Please include the following information:*

(a) The services CLCM provides its customers that provide it with drums and/or totes at Oak Creek;

(b) The number of customers that provide it with drums and/or totes currently contracted with Oak Creek;

(c) Identify by name, and provide the address for, the ten largest customers by volume of drums and/or totes processed by CLCM at the Oak Creek facility; and,

(d) Provide copies the contract or business agreement between CLCM and the customers that provide it with drums and/or totes for the Oak Creek facility identified in the question immediately above.

Response No. 15(a). A narrative description of certain business activities at the Oak Creek facility is enclosed with this response and is labeled as document Bates No. CLCM-RCRA-Q15(a)-000001.

REQUEST NO. 16. *Provide a schematic diagram of the burn unit, hereinafter referred to as "furnace." The diagram should include at a minimum the furnace itself, the conveyor, the ash collection system, the quench unit, and the associated after-burner.*

Response No. 16. A schematic diagram of the burn-off oven is enclosed with this Response and is labeled as document Bates No. CLCM-RCRA-Q16-000001.

REQUEST NO. 17. *Provide a narrative description of the management of the containers that have been determined to be cleanable, up to operation of the furnace. Include the following information:*

(a) The method for opening tight-head containers in the "Cutting Room" including, if applicable, emissions monitoring, emissions mitigation, and ignition source prevention;

(b) The method of placement of the containers on the conveyor chain into the furnace including spacing, timing, flipped or upright positioning, any other determinant factors; and,

(c) The average and maximum number of containers that can be processed at Oak Creek in a 24-hour period.

Response No. 17.

(a) Tight-head containers are opened using an automatic non-sparking drum deheader machine. Non-sparking tools are used in the cutting room.

(b) RCRA-empty open head drums are manually placed side by side on a drag chain and are taken to the burner where they are inverted onto the chain.

(c) The drum moves through the burner at a rate of approximately 230 per hour. The facility can process approximately 2,185 drums per day.

REQUEST NO. 18. *Provide the following information pertaining to the operation of the furnace:*

(a) A log or other record of the operating temperature of the furnace;

(b) A log or other record of the operating temperature of the after-burner;

(c) The typical residence time for one container in the furnace;

(d) A quantification of the energy (in joules or BTUs) that is needed to maintain the operating temperature of the furnace.

Response No. 18.

(a) Records of the operating temperature of the furnace are enclosed with this response and labeled as documents Bates No. CLCM-RCRA-Q18(a)-(b)-000001 to Bates No. CLCM-RCRA-Q18(a)-(b)-000196.

(b) Records of the operating temperature of the afterburner are enclosed with this response and labeled as documents Bates No. CLCM-RCRA-Q18(a)-(b)-000001 to Bates No. CLCM-RCRA-Q18(a)-(b)-000196.

(c) The typical residence time for one container in the furnace is four minutes.

(d) The furnace heating input is highly variable depending on numerous factors such as ambient conditions, drum throughput and drum type. Natural gas is not specifically metered at the furnace.

REQUEST NO. 19. *Inasmuch as these documents were not provided in your response to items 4 or 11, above, provide copies of each Standard Operating Procedure that addresses each of the following concepts at the Oak Creek Facility:*

(a) The receipt of shipments of incoming containers, including, but not limited to the following information:

i. Whether the shipment is transported by CLCM or by the vendor;

ii. The length of time a vendor may remain at Oak Creek before departing; in Specific time constraints for when a non-empty determination is to be made; and

iv. The length of time an unmanned trailer may remain on the premises before the load is evaluated.

(b) The process for determining if an incoming container is empty.

(c) The management of containers that are not empty, including, but not limited to the following information,

i. Whether there is a tracking system that is used to relate the non-empty container with the original vendor. If so, what is the tracking system;

ii. The length of time that a non-empty container may remain at Oak Creek;

iii. The markings and labels that are used by CLCM employees on the containers;

iv. Any protections that are provided for the containers to prevent damage or spills due to weather, poor container condition, vandalism, etc.; and

v. Inspections conducted in the area.

(d) The removal of containers that have been determined to be not empty, including but not limited to the following information,

i. The transporter used for the removal;

ii. The shipping documents that are sent with the removed containers;

iii. The charges that are applied to the vendor for removal;

iv. The destination(s) of the removed containers; and

v. The length of time that a container may remain at Oak Creek before the containers are removed.

Response No. 19. Please see below for the procedures employed by the Oak Creek facility in a narrative format and as currently described and communicated to employees in on-the-job training.

(a)(i) Shipments are transported by customers, customer vendors, and CLCM.

(ii) Vendors are limited to a maximum of two hours onsite before departing.

(iii) The facility determines whether containers are empty during unloading from delivery truck trailers. Unloading times vary based on load size and drum type.

(iv) An unmanned trailer may remain onsite for approximately a few hours up to a month or more.

(b) Employees are trained to identify potential non-empty containers for closer evaluation. The initial empty container evaluation process includes physical handling and visual assessment.

(c) (i) The tracking system for non-empty containers includes affixing reject labels on each container that include a tracking number. A bill of lading referencing the tracking number is then prepared and shipped with the containers back to the customer.

(ii) Typically, non-empty containers remain onsite for approximately one day to two weeks. In some instances, non-empty containers are rejected before the trailer is unloaded.

(iii) A reject label indicating the container is not empty is affixed to each container.

(iv) All non-empty containers are stored on a covered truck dock.

(v) Visual inspections of the non-empty containers are performed daily.

(d)(i) The non-empty container transporters include customers and customer vendors. CLCM does not transport the non-empty containers that it identifies during the evaluation process back to customers.

(ii) The non-empty container return shipping papers include bills of lading.

(iii) The charge applied for each non-empty container is $75.

(iv) The non-empty containers are transported back to the customers by customers and customer vendors.

(v) Non-empty containers typically remain onsite for approximately one day and up to two weeks. Customers are immediately notified when non-empty containers are identified.

REQUEST NO. 20. *Provide true, accurate, and complete copies of the following records as they pertain to the Oak Creek Facility, as applicable:*

(d) A current inventory of containers in storage (e.g., in trailers) awaiting evaluation for processing at the Oak Creek facility;

(e) A current inventory of containers in storage that have been determined to be not empty and will be returned to the vendor;

(f) Shipping records for outgoing wastes that were generated at Oak Creek, including, but not limited to the following:

i. Ash generated from the drum cleaning operation;

ii. Spent blast media;

iii. Spent bag house filters;

iv. Spent paint booth filters;

v. Wastes co-mingled from incoming vendor containers into common collection containers;

vi. Paint-related wastes, except for paint booth filters; and

vii. Waste water.

(g) Documentation of waste determinations for each of the wastes generated at the Oak Creek facility, including, but not limited to those wastes identified in item 201, above.

Response No. 20.

(d) Approximately 14,000 containers were onsite in trailers at the Oak Creek facility awaiting evaluation for processing as of July 18, 2017.

(e) There were six containers onsite at the Oak Creek facility as of July 19, 2017 that had been identified as non-empty.

(f) All waste shipping documents for the Oak Creek facility for the time period covered by the Information Request are enclosed with this response and are labeled as documents Bates No. CLCM-RCRA-Q13(f)-000001 to CLCM-RCRA-Q13(f)-000054.

(g) All waste determinations for the for the Oak Creek facility for the time period covered by the Information Request are enclosed with this response and are labeled as documents Bates No. CLCM-RCRA-Q13(g)-000001 to CLCM-RCRA-Q13(g)-000039.

Certification

REQUEST NO. 21. *Provide the following certification by a responsible corporate officer:*

> *I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.*

Signature: _____ Date: 7/26/17

Printed Name: IAN BOYLE

Title: VP/GM

AS TO OBJECTIONS:

CONTAINER LIFE CYCLE MANAGEMENT LLC

Dated: July 26, 2017

By: _____
Linda E. Benfield
Attorney for Container Life Cycle Management LLC

ADDRESS:
Foley & Lardner LLP
777 East Wisconsin Avenue
Milwaukee, WI 53202-5306
lbenfield@foley.com