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AIR ENFORCEMENT BRANCH
U.S. EPA REGION 5

May 10, 2017

Via E-Mail & FedEx

United States Environmental Protection Agency-Region 5
Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch
77 West Jackson Boulevard
Chicago, IL 60604
Patel.Manojkumar@epa.gov

Re: Response to Request to Provide Information Pursuant to Clean Air Act Dated April 5, 2017- Container Life Cycle Management LLC- St. Francis facility

Dear Sir/Madam:

On April 10, 2017, Container Life Cycle Management LLC ("CLCM") received a Clean Air Act Section 114(a) Information Request from the United States Environmental Protection Agency-Region 5 ("U.S. EPA") dated April 5, 2017. It is 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, to June 10, 2017.

CLCM has completed its responses to Requests 1, 2, 10, 13-14, and 16-19, and those responses are enclosed. CLCM will submit the responses to Requests 3-9, 11-12, and 15 by June 10, 2017.

Documents responsive to this request are provided as PDFs and Microsoft Excel files on the flash drive which will be arriving via FedEx, with a corresponding Table of Contents as requested. The PDFs 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 PURSUANT TO THE CLEAN AIR ACT

May 10, 2017

Container Life Cycle Management LLC ("CLCM") received the United States Environmental Protection Agency's ("U.S. EPA") Clean Air Act, Section 114(a) Information Request dated April 5, 2017 ("Information Request") directed to "Mid-America Steel Drum Company" regarding the facility at 3950 South Pennsylvania Avenue St. Francis, Wisconsin (hereinafter referred to as the "Facility"). CLCM, a joint venture that purchased the operating assets of the business from Mid-America Steel Drum Co., Inc. on November 4, 2013, currently operates the Facility. CLCM is responding to the Information Request as it applies to CLCM's operations; to the extent U.S. EPA requests information that predates CLCM's operations, CLCM can put U.S. EPA in contact with the previous owner of the facility.

CLCM received the Information Request on April 10, 2017. U.S. EPA has granted an extension of time for CLCM to respond to certain of the Requests; as agreed, this document includes responses to Requests 1, 2, 10, 13-14, and 16-19. In addition, CLCM will provide responses to the remainder of the Requests on June 10, 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 Clean Air 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 in Appendix B of 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. *Provide a schematic diagram of the facility, depicting the overall process.*

Response No. 1. A general process diagram is enclosed with this Response and is labeled as document Bates No. CLCM-CAA-St. Francis-Q1-000001.

Mark Furgason, Plant Manager at the St. Francis facility; Lauren Laabs, Principal Consultant at Mostardi Platt; Joel Lueking, Principal Consultant at Mostardi Platt; and Amy Litscher, President and Principal Scientist at SAGA Environmental and Engineering, Inc. provided information used or considered in this Response or were otherwise consulted in the preparation of this Response.

REQUEST NO. 2. *Provide a detailed narrative description of the processes employed at the facility to refurbish or recycle steel drums.*

Response No. 2.

Steel Tight Head Wash Drums

Steel tight head drums are unloaded from trailers onto the covered north receiving dock. Drums are sorted and are placed on a drag chain where they are lifted by elevator to the unbunging area. The drums are segregated into oil drums or chemical drums and are inverted onto a pre-flush wash station.

After the pre-flush station, the drum travels to an exterior wash and then internal wash station. The drum is then dried inside and is inspected internally. If found with rust, the interior is acid washed and the drum again follows the internal wash process.

Once the drum passes inspection, bungs are placed into the drum and the drum moves through the exterior steel shot blaster. After blast, the drum shell is cleaned of labels by manual grinding. When the shell is clean, the drum is painted on the exterior and proceeds through the drying oven.

Following the drying oven, the drum is air purged to remove any residual humidity and is then pressure tested for leaks.

The drum then has final inspection and labeling and is transferred to the loading dock for shipment.

Plastic Tight Head Drums

Tight head plastic drums are unloaded inside the building at the east loading dock. Drums are sorted as either wash drums or grind drums.

Grind drums may have unremovable stains, have an odor, may be damaged or may not be saleable due to manufacture or physical design. Grind drums are staged, flushed and are then ground into recyclable particles. The ground plastic is collected in cubic yard cardboard containers and is then sent off site to a plastic recycling facility.

Wash drums are placed on a drag chain and are moved to the pre-flush station where the bungs are removed and the drum is inverted onto the pre-flush nozzles. The drum is then placed in the external wash where the outside is cleaned.

After external wash the drum is placed on the internal flush. Following internal flush and rinse, the drum is air purged to remove water and lower the humidity level. The drum is then flame dried to complete the drying process.

Internal and external inspection and leak testing is the next process. After leak testing, the drum is labeled, bungs are inserted and then the drum proceeds by drag chain to the shipping dock where it is loaded for transport to the customer.

A more detailed narrative (language taken from Preliminary Determination, FID No. 341158070, Permit No. 14-RSG-142) is enclosed with this Response and is labeled as document Bates No. CLCM-CAA-St. Francis-Q2-000001.

Mark Furgason, Plant Manager at the St. Francis facility provided information used or considered in this Response or was otherwise consulted in the preparation of this Response.

REQUEST NO. 10. *Provide copies of all air quality permits issued by the Wisconsin Department of Natural Resources (WDNR), Bureau of Air Management, including, but not limited to, Part 70 Operating Permits, Permit to Install, or Construction Permits.*

Response No. 10. The permits responsive to this Request No. 10 and applicable to the CLCM operations are enclosed with this Response and are labeled as documents Bates No. CLCM-CAA-St. Francis-Q10-000001 to CLCM-CAA-St. Francis-Q10-000201.

Mark Furgason, Plant Manager at the St. Francis facility provided information used or considered in this Response or were otherwise consulted in the preparation of this Response.

REQUEST NO. 13. *Provide a detailed description of the type and amount of VOCs and hazardous air pollutants (HAPs) emitted by the facility, in pounds per hour and tons per year.*

Response No. 13. Documentation responsive to Request No. 13 and applicable to the CLCM operations is enclosed with this Response and is labeled as documents Bates No. CLCM-CAA-St. Francis-Q13-000001 to CLCM-CAA-St. Francis-Q13-000140. Please note that the 2016 report included in the referenced documentation has been submitted, but has not yet been certified. Please also see documents labeled as Bates No. CLCM-CAA-St. Francis-Q16-000001 to CLCM-CAA-St. Francis-Q16-000505 and Bates No. CLCM-CAA-St. Francis-Q19(e)-(g)-000001 to CLCM-CAA-St. Francis-Q19 (e)-(g)-000058 for additional responsive information.

REQUEST NO. 14. *For each process at the facility emitting VOCs or HAPs, provide the actual hours of operation in hours per day, days per week, and hours per year.*

Response No. 14. The operating hours for the facility are: (i) 10 hours per day, (ii) 5 days per week, and (iii) 2,600 hours per year.

Mark Furgason, Plant Manager at the St. Francis facility provided information used or considered in this Response or was otherwise consulted in the preparation of this Response.

REQUEST NO. 16. *Provide the following information, as required by Condition I.G.3.c.(2) of the Construction Permit (Permit No. 14-RSG-142), for the Auto Exterior Drum Spray Booth (P32C), Curing Oven (P32B), and Closed Drum Drying Oven (P50C) in a Microsoft Excel workbook or other compatible format, where appropriate:*

a. *A unique name or identification number for each coating, as applied;*

b. *A unique name of identification number for each coating, cleanup solvent, and thinner, as received;*

c. *The VOC content of each coating in pounds per gallon, as applied;*

d. *The VOC content of each coating, as applied in units of pounds VOC per gallon, excluding water;*

e. *The VOC content of each coating, thinner, and cleanup solvent, as received;*

f. *If coatings as received are thinned prior to use, the quantities Qc and Qt needed to calculate VOCa as described in Condition I.G.3.b.(2) of the Construction Permit; and*

g. *MSDS or equivalent document, which contains information to determine VOC content for each coating or solvent.*

Response No. 16. The information responsive to this Request No. 16 is enclosed with this Response and is labeled as documents Bates No. CLCM-CAA-St. Francis-Q16-000001 to CLCM-CAA-St. Francis-Q16-000505.

Mark Furgason, Plant Manager at the St. Francis facility; Lauren Laabs, Principal Consultant at Mostardi Platt; Joel Lueking, Principal Consultant at Mostardi Platt; and Amy Litscher, President and Principal Scientist at SAGA Environmental and Engineering, Inc. provided information used or considered in this Response or were otherwise consulted in the preparation of this Response.

REQUEST NO. 17. *For P32C, provide the following information:*

a. *Any MSDSs used to determine the VOC content of any coating or solvent washing;*

b. *Any published literature, including but not limited to the manufacturer's Technical Data Sheets, used to determine the VOC content of any coating or solvent washing; and*

g. *Any mass balance calculations, and accompanying published literature supporting the values used in the calculations, used to determine the VOC content of compounded and/or thinned coatings or solvent washings.*

Response No. 17. The information responsive to this Request No. 17 is enclosed with this Response and labeled as documents Bates No. CLCM-CAA-St. Francis-Q17-000001 to CLCM-CAA-St. Francis-Q17-000460.

Mark Furgason, Plant Manager at the St. Francis facility; Lauren Laabs, Principal Consultant at Mostardi Platt; Joel Lueking, Principal Consultant at Mostardi Platt; and Amy Litscher, President and Principal Scientist at SAGA Environmental and Engineering, Inc. provided information used or considered in this Response or were otherwise consulted in the preparation of this Response.

REQUEST NO. 18. *Provide records for all processes at the facility that are currently exempt from permitting but for which you are required to maintain records to demonstrate compliance with any permit exemptions.*

Response No. 18. The Facility is not required to maintain records to demonstrate compliance with any permit exemptions.

Mark Furgason, Plant Manager at the St. Francis facility; Lauren Laabs, Principal Consultant at Mostardi Platt; Joel Lueking, Principal Consultant at Mostardi Platt; and Amy Litscher, President and Principal Scientist at SAGA Environmental and Engineering, Inc. provided information used or considered in this Response or were otherwise consulted in the preparation of this Response.

REQUEST NO. 19. *For P32C, as required by Condition I.H.4.d. of the Construction Permit, provide the following records:*

a. *A copy of each notification and report that the facility submitted to comply with 40 C.F.R. Part 63, Subpart MMMM, and the documentation supporting each notification and report;*

b. *A current copy of information provided by material suppliers or manufacturers, such as manufacturer's formulation data, or test data, including summary sheets, used to determine the mass fraction of organic HAP and density for each coating, thinner, other additive, cleaning material, and the volume fraction of coating solids for each coating;*

c. *If you conducted testing to determine mass fraction of organic HAP, density or volume fraction of coating solids, provide copy of the complete test report(s);*

d. *Records of the calculation of the organic HAP content for each coating, using Equation 2 of 40 C.F.R. § 63.3941;*

e. *A record of the name and volume (or purchase records, if applicable) of each coating, thinner, other additive, and cleaning material used;*

f. *A record of the mass fraction of organic HAP for each coating, thinner, other additive, and cleaning material used;*

g. *A record of the volume fraction of coating solids for each coating used;*

h. *If you used the emission rate without add-on controls compliance option, provide records showing the density for each coating, thinner, other additive, and cleaning material used; and*

i. *If you used the emission rate without add-on controls compliance option and the calculation includes an allowance for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF), provide records of:*

   i. *The name and address of each TSDF;*

   ii. *The date of each shipment;*

   iii. *Identification of coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these waste materials when calculating the emission rate;*

   iv. *The methodology used to determine total amount of waste materials sent to or the amount collected, stored and designated for transport to a TSDF each month and the methodology used to determine the mass of organic I-1AP contained in these waste materials; and*

   v. *Records of the date, time and duration of each deviation.*

Response No. 19.

(a) The semi-annual monitoring reports responsive to this Request No. 19(a) and applicable to the CLCM operations are enclosed with this Response as

documents labeled Bates No. CLCM-CAA-St. Francis-Q19(a)-000001 to CLCM-CAA-St. Francis-Q19(a)-000097.

(b) The Material Safety Data Sheets ("MSDS") and Technical Data Sheets response to this Request No. 19(b) are enclosed with this Response as documents labeled Bates No. CLCM-CAA-St. Francis-Q19(b) and (d)-000001 to CLCM-CAA-St. Francis-Q19(b) and (d)-000460.

~~(c) This Request No. 19(c) is not applicable to the facility.~~

(d) The Material Safety Data Sheets ("MSDS") and Technical Data Sheets response to this Request No. 19(d) are enclosed with this Response as documents labeled Bates No. CLCM-CAA-St. Francis-Q19(b) and (d)-000001 to CLCM-CAA-St. Francis-Q19(b) and (d)-000460.

(e) The records responsive to this Request No. 19(e) and applicable to the CLCM operations are enclosed with this Response as documents labeled Bates No. CLCM-CAA-St. Francis-Q19(e)-(g)-000001 to CLCM-CAA-St. Francis-Q19(e)-(g)-000058.

(f) The records responsive to this Request No. 19(f) are enclosed with this Response as documents labeled Bates No. CLCM-CAA-St. Francis-Q19(e)-(g)-000001 to CLCM-CAA-St. Francis-Q19(e)-(g)-000058.

(g) The records responsive to this Request No. 19(g) are enclosed with this Response as documents labeled Bates No. CLCM-CAA-St. Francis-Q19(e)-(g)-000001 to CLCM-CAA-St. Francis-Q19(e)-(g)-000058.

(h) This Request No. 19(h) is not applicable to the facility.

(i) This Request No. 19(i) is not applicable to the facility.

Mark Furgason, Plant Manager at the St. Francis facility; Lauren Laabs, Principal Consultant at Mostardi Platt; Joel Lueking, Principal Consultant at Mostardi Platt; and Amy Litscher, President and Principal Scientist at SAGA Environmental and Engineering, Inc. provided information used or considered in this Response or were otherwise consulted in the preparation of this Response.

AS TO OBJECTIONS:

CONTAINER LIFE CYCLE MANAGEMENT LLC

Dated: May 10, 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

AFFIDAVIT OF MARK FURGASON

STATE OF WISCONSIN)
) ss.
COUNTY OF MILWAUKEE)

Mark Furgason, being first duly sworn on oath, states as follows:

(1) I am the Plant Manager for the St. Francis facility and am familiar with the facility owned by Container Life Cycle Management LLC ("CLCM") located at 3950 South Pennsylvania Avenue, St. Francis, Wisconsin.

(2) I make this affidavit in support of CLCM's response to the United States Environmental Protection Agency's ("U.S. EPA") request pursuant to Section 114 of the Clean Air Act for information regarding the facility located at 3950 South Pennsylvania Avenue, St. Francis, Wisconsin dated May 10, 2017 (the "Response").

(3) The objections asserted in the Response are authorized by CLCM.

(4) CLCM has completed a diligent record search and a diligent interviewing process with employees who may have relevant knowledge of the operations and activities at the facility that are the subject of the Response.

(5) To the best of my knowledge, based upon the information currently in CLCM's possession and subject to the objections asserted in the Response, this Response is true, correct and accurate. CLCM reserves the right to revise, amend and/or update the Response in the future if CLCM obtains additional relevant or responsive information.

(6) I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

Mark Furgason
Plant Manager

Subscribed and sworn to before me
this 10 day of May, 2017

Sherry L. Kannenberg
NOTARY PUBLIC, State of Wisconsin
My Commission is/expires: 1-19-2020

SHERRY L KANNENBERG
Notary Public
State of Wisconsin