United States Environmental Protection Agency
Regional Administrator
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

OCT 18 2017

The Honorable Gwen Moore
House of Representatives
Washington, D.C. 20515

Dear Congresswoman Moore:

Thank you for your September 28, 2017 letter concerning the investigation into the whistleblower allegations of serious and willful violations of environmental laws by Greif, Inc. and Container Life Cycle Management, Inc., including at Mid-America Steel Drum Company, Inc. (MASD) at locations in Milwaukee, St. Francis, and Oak Creek, Wisconsin.

As you know, the U.S. Environmental Protection Agency is investigating these facilities for potential violations of federal environmental laws. Since February 2017, EPA and the Wisconsin Department of Natural Resources (WDNR) have conducted multiple site visits and inspections of the three facilities in and around Milwaukee. EPA and WDNR are committed to expeditiously investigating and pursuing any potential violations at these facilities.

Since my staff last communicated with your office, EPA issued an information request, dated June 28, 2017, under Section 3007 of the Resource Conservation and Recovery Act to Container Life Cycle Management, Inc. (d/b/a Mid-America Steel Drum), that seeks information regarding waste disposal at the facilities. A copy of the information request is enclosed.

On September 9, 2017, EPA met with representatives from the Reusable Industrial Packaging Association, Greif, and MASD, at their request, to listen to the trade association and MASD's position with respect to the scope and applicability of Resource Conservation and Recovery Act regulatory requirements.

In July 2017, EPA collected soil samples in the area surrounding the MASD facility in St. Francis to determine if pollutants had contaminated the ground around the facility in response to citizen complaints of visible emissions from the facility. Soil sampling results did not detect pollutants above background levels. EPA also collected ambient air samples in the area surrounding the St. Francis facility in July 2017 in response to citizen complaints of visible and odorous emissions from the facility. EPA is working with the Agency for Toxic Substances and Disease Registry (ATSDR) to analyze the air samples and determine if the emissions pose a risk to human health. EPA collected additional air samples around the St. Francis facility in August 2017. EPA is analyzing these samples and will also share the results with ATSDR. In September 2017, pursuant to an EPA Clean Air Act information request, MASD undertook stack testing at

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the scrubber at the St. Francis facility. A copy of the information request is enclosed. EPA expects to receive those results this month, and will share them with ATSDR for analysis. EPA may also use those results to inform additional air sampling recommended by ATSDR.

At the appropriate time during EPA's investigation, we look forward to working with your staff to host a public meeting to provide the public with sampling results and other relevant information. We will post this information on our web site as well.

Again, thank you for your letter. If you have further questions, please contact me or your staff may contact Denise Fortin or Ronna Beckmann, the Region 5 Congressional Liaisons, at (312) 886-3000.

Sincerely,

Robert A. Kaplan
Acting Regional Administrator

Enclosures