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CLIENT/MATTER NUMBER
110874-0103

April 24, 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 March 20, 2017- Container Life Cycle Management LLC- Oak Creek facility

Dear Sir/Madam:

On March 23, 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 March 20, 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 May 24, 2017.

CLCM has completed its responses to Requests 1, 2, 8, 12, and 14-19, and those responses are enclosed. CLCM will submit the responses to Question 3-7, 9-11, and 13 by May 24, 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

April 24, 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 March 20, 2017 ("Information Request") directed to "Mid-America Steel Drum Company" regarding the facility at 8570 South Chicago Road, Oak Creek, 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 March 23, 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, 8, 12, and 14-19. In addition, CLCM will provide responses to the remainder of the Requests on May 24, 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-Q1-000001.

Kevin Meyer, Plant Manager at the Oak Creek facility; Lauren Laabs, Principal Consultant at Mostardi Platt; and Joel Lueking, Principal Consultant at Mostardi Platt 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. The facility receives Resource Conservation Recovery Act ("RCRA") empty steel drums that are typically 55 gallons in size. Upon receipt and throughout the reconditioning process, the drums are inspected to determine whether they can be reused. All parts of the drum (rings/covers/bungs etc.) are handled in the same fashion as the drums.

Tight head and open head steel drums are received at the receiving docks. The drums are unloaded onto covered docks where they are sorted for processing. Open head drums are placed on a drag chain and are taken to the burner where they are inverted onto the chain. The drum then moves through the burner where any product residue and paint are burned off at approximately 1200 degrees Fahrenheit.

Tight head drums are removed from the incoming trailer and are placed on a drag chain taking them to a cutting room where the head of the drum is removed by a large opener

similar in style to a can opener. If the drum is to be converted into an open head drum, the sharp edge of the shell is rounded over to create a new seal for a drum cover. The cut lid is replaced onto the top of the drum and the drum continues to the furnace. The drum then follows the burner process of an open head drum.

After burning in the furnace, the drum moves to the steel shot blaster where the inside and outside are blasted to remove any scale, rust or debris. The drum is then re-formed by an internal press and new rolling hoops are pressed into the exterior.

Following re-forming, the drum is sealed and tested for leaks. The drum has a compound inserted into the interior lower chime to ensure that there are no leaks or dust coming back into the drum. The drum is then lined internally with paint and dried in an oven. The drum then receives exterior paint and is dried in an oven.

Following the final paint, the drum is conveyed by drag chain to the assembly area where appropriate closure parts are installed. The drum then moves to the shipping dock where it is loaded on a trailer for transport to the customer. All drums/parts that are determined to be non-reusable are scrapped.

A more detailed narrative including non-emitting equipment is enclosed with this Response and is labeled as document Bates No. CLCM-Q2-000001.

Kevin Meyer, Plant Manager at the Oak Creek facility; Lauren Laabs, Principal Consultant at Mostardi Platt; and Joel Lueking, Principal Consultant at Mostardi Platt provided information used or considered in this Response or were otherwise consulted in the preparation of this Response.

REQUEST NO. 8. *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. 8. The facility's original Part 70 Source operation permit, 241021220-P01 was issued on November 21, 2003. On January 2, 2009, the WDNR issued the "Part 70 Source Operation Permit Renewal", 241021220-P10. On June 11, 2013, the WDNR issued the "Renewal of Part 70 Source Operation Permit No. 241021220-P20 ("Renewal of Operating Permit No. 241021220-P10"). These permits are enclosed with this Response and are labeled as documents Bates No. CLCM-Q8-000001 to CLCM-Q8-000068.

Kevin Meyer, Plant Manager at the Oak Creek facility; Lauren Laabs, Principal Consultant at Mostardi Platt; and 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. 12. *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. 12. The facility hours of operation include (i) 10 hours per day, (ii) 5 days per week, and (iii) 2,520 hours per year. All processes operate while the facility is in operation.

Kevin Meyer, Plant Manager at the Oak Creek facility; Lauren Laabs, Principal Consultant at Mostardi Platt; Joel Lueking, Principal Consultant at Mostardi Platt provided information used or considered in this Response or were otherwise consulted in the preparation of this Response.

REQUEST NO. 14. *Provide a description of the steps taken by the Responsible Official to certify the truth, accuracy, and completeness of reports required by the Part 70 Operation Permit.*

Response No. 14. The facility provides all the material usage records and production numbers to a third party consultant to develop emissions data and to prepare the reports. The records provided to the consultant are verified by the plant management on an ongoing basis.

Kevin Meyer, Plant Manager at the Oak Creek facility; Lauren Laabs, Principal Consultant at Mostardi Platt; and Joel Lueking, Principal Consultant at Mostardi Platt provided information used or considered in this Response or were otherwise consulted in the preparation of this Response.

REQUEST NO. 15. *Describe any procedures employed at the facility to prevent spillage, escape, or emission of organic compounds from the handling, transportation, storage, and disposal of VOC containing materials, including coatings, cleaning agents, and contaminated rags.*

Response No. 15. A description of the procedures employed by the facility to prevent spillage, escape, or emissions of organic compounds from the handling, transportation, storage, and disposal of VOC containing materials, including coatings, cleaning agencies, and contamination rags is included in the "Solvent Management Plan" which is enclosed with this Response and is labeled as document Bates No. CLCM-Q15-000001.

Kevin Meyer, Plant Manager at the Oak Creek facility; Lauren Laabs, Principal Consultant at Mostardi Platt; and Joel Lueking, Principal Consultant at Mostardi Platt provided information used or considered in this Response or were otherwise consulted in the preparation of this Response.

REQUEST NO. 16. *Provide the following information (unless otherwise indicated, on a weekly or daily basis as required by Condition I.C.1.c.(4) or (5) and Condition I.D.1.c.(3) of the Part 70 Operating Permit) for the Interior Drum coating line (P33), the Exterior Drum coating line (P34), and Drum Ring Dip Tank (P37) in Microsoft Excel or other compatible format, where appropriate:*

(a) Identification of each coating applied or used;

(b) The VOC content of each coating, as applied or used, in units of pounds per gallon (excluding water);

(c) *VOC content of each solvent washing, as applied or used, in units of pounds per gallon;*

(d) *Total hours of operation;*

(e) *VOCs generated (lbs);*

(f) *Gallons of each coating applied or used daily, if in-line averaging is used, or annually, if in-line averaging is not used;*

(g) *Gallons of solvent washing applied or used daily, if in-line averaging is used, or annually, if in-line averaging is not used;*

(h) *The daily volume-weighted average VOC content of all coatings applied on each coating line in pounds per gallon, excluding water, if in-line averaging is used; and*

(i) *For P33, P34, and P37, broken down by each emission unit, VOC emissions in pounds per gallon of coating (excluding water).*

Response No. 16. The information responsive to Request No. 16 is enclosed with this Response as documents labeled Bates No. CLCM-Q16-000001 to CLCM-Q16-000049.

Kevin Meyer, Plant Manager at the Oak Creek facility; Lauren Laabs, Principal Consultant at Mostardi Platt; and Joel Lueking, Principal Consultant at Mostardi Platt provided information used or considered in this Response or were otherwise consulted in the preparation of this Response.

REQUEST NO. 17. *For P33, P34, and P37, 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 Technical Data Sheet, used to determine the VOC content of any coating or solvent washing; and*

(c) *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.

(a) Safety data sheets ("SDS") for each of the coatings and one clean-up solvent (acetone) used for P33, P34 and P37 are enclosed with this Response as documents labeled Bates No. CLCM-Q17(a)-000001 to CLCM-Q17(a)-000193.

(b) Certified Product Data Sheets ("CPDS") used to determine the VOC content of the coatings (not applicable for VOC-exempt acetone clean-up solvent) used for P33, P34 and P37 are enclosed with this Response as documents labeled Bates No. CLCM-Q17(b)-000001 to CLCM-Q17(b)-000020.

(c) This Request No. 17(c) is not applicable to the facility. The coatings are not compounded and solvent washings are not thinned.

Kevin Meyer, Plant Manager at the Oak Creek facility; Lauren Laabs, Principal Consultant at Mostardi Platt; and Joel Lueking, Principal Consultant at Mostardi Platt 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 exempt from permitting but for which you are required to maintain records to demonstrate compliance with any permit exemptions.*

Response No. 18. The facility's Part 70 air permit includes the following insignificant emission unit list:

- Maintenance of Grounds, Equipment and Buildings
- Boiler, Turbine and HVAC System Maintenance
- Pollution Control Equipment Maintenance
- Internal Combustion Engines Used for Warehousing and Material Transport
- Fire Control Equipment
- Janitorial Activities
- Office Activities
- Convenience Water Heating
- Convenience Space Heating (< 5 million BTU/hr Burning Gas, Liquid or Wood)
- Sanitary Sewer and Plumbing Venting
- Caustic Cleaning Lines (P31)
- Three (3) Shot Blasting Machines (Process B32), exhausts indoors

The caustic cleaning lines (P31) were decommissioned and will not be reactivated. The listed insignificant emission units do not require recordkeeping in order to demonstrate compliance with permit exemptions.

Kevin Meyer, Plant Manager at the Oak Creek facility; Lauren Laabs, Principal Consultant at Mostardi Platt; and Joel Lueking, Principal Consultant at Mostardi Platt provided information used or considered in this Response or were otherwise consulted in the preparation of this Response.

REQUEST NO. 19. *For P33, P34, and P37, as required by Section I.E.5. of the Part 70 Operating 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; and

(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 HAP contained in these waste materials.

(j) Records of the date, time and duration of each deviation.

Response No. 19.

(a) The facility submitted the Initial Notification for NESHAP MMMM before January 2005. As included in the facility's current Part 70 Source operation permit, 241021220-P20, Condition I.ZZZ.4.a.(3) indicates, "records required under this permit shall be retained for at least five (5) years … ." The facility not retained many documents that exceed five years, and at this time is unable to locate a copy of the Initial NESHAP MMMM Notification. As allowed in the previous and current air permits, the NESHAP MMMM semi-annual reporting conditions are incorporated into the above-referenced five years of Semi-Annual Monitoring Reports which are enclosed with this Response as documents labeled Bates No. CLCM-Q19(a)-000001 to CLCM-Q19-000144.

(b) The SDS's and Technical Data Sheets responsive to this Request 19(b) are enclosed with this Response as documents labeled Bates No. CLCM-Q19(b)/(d)-000001 to CLCM-Q19(b)/(d)-000213.

(c) The facility uses vendor provided data and conducts no independent testing.

(d) The facility uses vendor provided data and performs no independent calculations. The SDS's and Technical Data Sheets that include information responsive to this Request 19(d) are enclosed with this Response as documents labeled Bates No. CLCM-Q19(b)/(d)-000001 to CLCM-Q19(b)/(d)-000213.

(e) Data responsive to this Request 19(e) is included within the "NESHAP MMMM" document enclosed with this Response as document labeled Bates No. CLCM-Q19(e)-(g)-000001.

(f) Data responsive to this Request 19(f) is included within the "NESHAP MMMM" document enclosed with this with this Response as document labeled Bates No. CLCM-Q19(e)-(g)-000001.

(g) Data responsive to this Request 19(g) is included within the "NESHAP MMMM" document enclosed with this Response as document labeled Bates Bates No. CLCM-Q19(e)-(g)-000001.

(h) Request 19(h) is not applicable to the facility.

(i) Request 19(i) is not applicable to the facility.

(j) CLCM's review identified no deviations for the time period covered by this Information Request.

Kevin Meyer, Plant Manager at the Oak Creek facility; Lauren Laabs, Principal Consultant at Mostardi Platt; and 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: April 24, 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 KEVIN MEYER

STATE OF WISCONSIN)
) ss.
COUNTY OF MILWAUKEE)

Kevin Meyer, being first duly sworn on oath, states as follows:

(1) I am the Plant Manager for the Oak Creek facility and am familiar with the facility owned by Container Life Cycle Management LLC ("CLCM") located at 8570 South Chicago Road, Oak Creek, 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 8570 South Chicago Road, Oak Creek, Wisconsin dated April 24, 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.

Kevin Meyer
Plant Manager

Subscribed and sworn to before me
this 24 day of April, 2017

Theresa A. Sugrue
NOTARY PUBLIC, State of Wisconsin
My Commission is/expires: 7-19-18