UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA FOCUSED COMPLIANCE INSPECTION REPORT

FACILITY NAME:	**MID AMERICA IBC**
FACILITY U.S. EPA ID NO.:	None
FACILITY TYPE:	Non-Notifier
FACILITY ADDRESS:	2300 West Cornell Street Milwaukee, Wisconsin 53209
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE OF INSPECTION:	February 24, 2017
NAICS CODE:	332439 – Other Metal Container Manufacturing

PREPARED BY: Walt Francis _____ 3/20/2017 _____
Walt Francis
Environmental Scientist
Date

APPROVED BY: _____ 3/27/17 _____
Julie Morris, Chief
Compliance Section 2
RCRA Branch
Date

Purpose of Inspection

This inspection was an evaluation of Mid America IBC's compliance with hazardous waste, used oil, and universal waste regulations found in the Wisconsin Administrative Code (WAC) and the Code of Federal Regulations (CFR). The inspection team included inspectors from the Wisconsin Department of Natural Resources (WDNR), the U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration, and myself. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) focused compliance evaluation inspection (FCI). The site never notified as a generator of hazardous waste.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspectors -
Walt Francis, RCRA Program
James Entzminger, EPCRA Program
Kathy Halbur, Superfund Emergency Response
Manojkumar Patel, CAA Program

United States Department of Transportation (U.S. DOT) Inspectors –
Laura Kwilinski, PHMSA
Mark Razny, PHMSA

Wisconsin Department of Natural Resources (WDNR) Inspectors –
Edward Lynch, Waste Program
George Volpentesta, Air Program
Bryan Hartsook, Wastewater Program
Steve Mueller, Remediation and Redevelopment Program
Benjamin Benninghoff, Stormwater Program

Representatives of Mid-America IBC –
Rodney Knash, Operator
Linda Benfield, Attorney Foley and Lardner, LLP
Amanda Beggs, Attorney Foley and Lardner, LLP
Siva Sambasivam, Greif

Site Description/Background Information

Mid-America Steel Drum Company was established in 1975. Mid-America Steel Drum has four locations in Milwaukee County (3950 S. Pennsylvania Avenue, St. Francis, 2529 E. Norwich Avenue, St. Francis, 8570 S. Chicago Road, Oak Creek, and 2300 W. Cornell St., Milwaukee, Wisconsin). The Cornell Street facility receives 250-gallon plastic and metal totes. The totes are stored prior to processing. Tote processing includes the removal of any liquid contents with a shop vacuum apparatus. The removed liquids are accumulated in 250-gallon totes and sent off-

site as a "Non-Hazardous Waste" to Badger Disposal. The next step includes an internal cleaning with soapy water and caustic. The used cleaning solution is pumped over a paper filter which removes debris. The exterior of the totes are then power washed. Based on customer specifications, either a reused plastic tote or a new plastic tote is placed in the metal tote cage and then sold to the customer. Mid-America personnel told the inspectors that if any tote arrives that contains corrosive or flammable material they are shipped to National Container, Chicago, Illinois. Mid America IBC also operates a "Cut and Scrape Operation" at the Milwaukee facility. Totes which have a residue on the bottom are placed in a saw apparatus which cuts off the bottom of the tote. Workers scrape any remaining residue into 55-gallon drums. The recovered plastic is sold to "Indy Drum". Mid-American IBC employees told the inspectors that any totes that come in as "Heavy" that do not meet the RCRA empty standards are rejected. Mid-America IBC also has a Maintenance Shop where they accumulate used fluorescent lamps. Mid-America IBS processes about 80 totes per day, operates Monday through Friday 6:00 am to 3:30 pm, has seven employees, and has been at this location for 5 years. The building occupies 30,000 square feet, and 2.66 acres. According to Mid America IBC personnel any shipping papers are stored at the Oak Creek facility.

The Milwaukee facility generates cut and scrape waste material and tote vacuuming residue, plastic and metal scrap, and used washwater. Cut and scrape residues and tote liquid residue are shipped to Badger Disposal, plastic and metal scrap are sent off-site to auto scrap yard, and the used wash water and any preflush is picked up by Advanced Waste Disposal.

Opening Conference

U.S. EPA, U.S. DOT, and WDNR representatives arrived at the Mid America IBC facility at approximately 8:55 am. The inspection group entered the facility through the truck gate and entered the facility by the loading dock. The inspectors were taken to the lunch room. The inspectors introduced themselves to Mr. Rodney Knash and Ms. Linda Benfield. A short time later, Mr. James Entzminger arrived at the facility. Inspector Francis presented his credentials to Ms. Benfield. Inspector Francis informed them of the nature, scope, and procedures of the inspection. The inspection was conducted by U.S. EPA, U.S. DOT and WDNR personnel. Mr. Knash provided the inspectors with an in depth review of the facility, and provided information on the various waste streams. Ms. Benfield told the inspectors that any photographs taken should be considered CBI. Mr. Rodney Knash allowed the inspector access to the facility to conduct the inspection.

Site Tour

The walk-through began at the Loading Dock area. Mr. Knash explained how totes arrive and are staged for storage (see photograph number 7). Mr. Knash took the inspectors to the Shop Vacuum Area. Mr. Knash explained how any liquid material is vacuumed out of the totes and placed in waste totes, see photographs number 1 and 2. The walk-through continued to the wash area. Mr. Knash showed the inspectors how the insides of the totes are washed with soap, caustic

and water. Mr. Knash then took the inspectors to the filter paper area and wash tanks, see photographs 3, 5, and 6. Inspector Francis observed four 250-gallon totes in this area waiting to be shipped to Badger Disposal, see photograph number 4. Mr. Knash told Inspector Francis that the totes contained tote vacuumed residues. The walkthrough continued to the Maintenance Shop. Inspector Francis observed a box of used compact fluorescent bulbs, see photograph number 8. The walkthrough continued to the "Drain Table". Residues from 250-gallon totes are drained into 55-gallon drums, see photographs 9 and 11. Mr. Knash showed the inspectors the tote cutting area, see photograph number 10. The walkthrough continued outside. Mr. Knash showed the inspectors totes waiting for processing, see photograph numbers 12 and 13. The walkthrough continued indoors, where Mr. Knash showed the inspectors two drum drying ovens and two 55-gallon containers, see photograph number 14. The inspection continued to an older area of the facility. Inspector Francis observed eight 55-galllon containers, see photograph number 15. The walkthrough continued back to the lunch room area. Inspector Francis observed one 250-gallon tote of "Drain Table Residue" waiting to be shipped out and the Cut and Scrape Area Drain Table, and a "Recertified 250-Gallon Tote M4712, see photograph numbers 16, 17, and 18.

The inspectors returned to the lunch room to review records.

Records Review

Mr. Knash provided Inspector Francis with a hazardous waste manifest for one tank truck load of non-hazardous waste water sent to Advanced Waste Services, Milwaukee, Wisconsin. A Non-Hazardous Waste Manifest for the shop vacuum residue sent to Badger Disposal, Milwaukee, Wisconsin, and an example incoming "Empty Totes For Recycle" Bill of Lading from Valspar Corp, Wheeling, Illinois. Inspector Francis asked Mr. Knash about waste determination records. Mr. Knash told Inspector Francis that he had the various waste streams analyzed recently, but did not have the results.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and would be waiting for the waste determination records. Inspector Francis provided a U.S. EPA Small Business Resources, and a U.S. EPA Region 5 Pollution Prevention contact sheet to Mr. Knash.

Attachments
Photographs.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID 045 953 189
2. Page 1 of: 1
3. Emergency Response Phone: 800/842-4792 (AWC)
4. Manifest Tracking Number: 012532568 JJK

GENERATOR

5. Generator's Name and Mailing Address
Mid-America Steel Drum Co.
2300 W. Cornell St.
Milwaukee, WI 53209
Generator's Phone: (414) 235-0282 Chaine

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Advanced Waste Carriers, Inc. (AWC)
U.S. EPA ID Number: WI0000815301

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Advanced Waste Services - Chemworks
3801 W. West McKinley Ave
Milwaukee, WI 53208
Facility's Phone: 414-342-1852
U.S. EPA ID Number: WIR000136572

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	Non RCRA regulated, Non DOT hazardous Liquid material	001	TT	500	G	NONE
	2. WASTE WATER					
	3. 03-07-14					
	4.					

14. Special Handling Instructions and Additional Information
Profile # L 047489-0-8-1-Cw

Trailer #
Generator Representative Signature
Site arrival time
Site departure time

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name | Signature | Month | Day | Year

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name | Signature | Month | Day | Year
Transporter 2 Printed/Typed Name | Signature | Month | Day | Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) | Month | Day | Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name | Signature | Month | Day | Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

GENERATOR'S INITIAL COPY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator ID Number
2. Page 1 of
3. Emergency Response Phone
4. Waste Tracking Number

5. Generator's Name and Mailing Address

Generator's Site Address (if different than mailing address)

Generator's Phone:

6. Transporter 1 Company Name — U.S. EPA ID Number

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address — U.S. EPA ID Number

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	
	1.					
	2.					
	3.					
	4.					

13. Special Handling Instructions and Additional Information

14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Generator's/Offeror's Printed/Typed Name — Signature — Month Day Year

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:

Transporter signature (for exports only): Date leaving U.S.:

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name — Signature — Month Day Year

Transporter 2 Printed/Typed Name — Signature — Month Day Year

17. Discrepancy

17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

17c. Signature of Alternate Facility (or Generator) — Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name — Signature — Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

6-NHM-C-C-11

6-GENERATOR'S INITIAL COPY

Date: 23-Feb-2017

BILL OF LADING

SHIP FROM

Name: VALSPAR CORP
Address: 1191 S. WHEELING ROAD
City/State/Zip: WHEELING, IL. 60090
SID#: 391
FOB: ☐

Bill of Lading Number: 391-02232017

CARRIER NAME: WILL CALL
Trailer number:
Seal number(s)

SHIP TO

Name: MID AMERICA STEEL DRUM
Address: 2360 W. CORNELL STREET
City/State/Zip: MILWAUKEE, WI. 53209
SID#:
FOB: ☐

SCAC:
Pro number:

THIRD PARTY FREIGHT CHARGES BILL TO

Name: VALSPAR C/O CASS I.S.
Address: P.O. BOX 17636
City/State/Zip: SAINT LOUIS, MO 63178-7636

Freight Charge Terms: (freight charges are prepaid unless marked otherwise)

Prepaid **Collect** **3rd Party**

SPECIAL INSTRUCTIONS ***PROTECT FROM FREEZING

☐ (check box) Master Bill of Lading with attached underlying Bills of Lading

CUSTOMER ORDER INFORMATION

CUSTOMER ORDER NUMBER	#PKGS	WEIGHT	Pallet/ Slip	ADDITIONAL SHIPPER INFO
				ATTN SHERRY 15 60 SUNC 275 FAXED 2-23-17 PK
GRAND TOTAL				

CARRIER INFORMATION

HANDLING UNIT QTY	HANDLING UNIT TYPE	PACKAGE QTY	PACKAGE TYPE	WEIGHT	H.M.	COMMODITY DESCRIPTION (Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensue safe transportation with ordinary care. See Section 2(e) of NMFC Item 360)
4	TOTE	4	TOTE	600 LBS		EMPTY TOTES FOR RECYCLE LAST CONTAINED (CP0005B) PAINT ADDITIVE,8, UN3066, II
56	TOTE	56	TOTE	8400 LBS		EMPTY TOTES FOR RECYCLE LAST CONTAINED LATEX, NOT REGULATED
60		60		9000 LBS		GRAND TOTAL

CORROSIVE 8

Additional Handling Information Placards Offered: Y Chep Pallets: N

Emergency Response, 24-hour number 1-888-748-5558 Outside of USA/Canada +1-703-527-3887

***PROTECT FROM FREEZING

Whereas the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows;
"The agreed or declared value of the property is specifically stated by the shipper to be not exceeding
per

COD Amount $
Fee Terms: *Collect:* ☐ *Prepaid:* ☐
Customer check acceptable: ☐

NOTE Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. -14706(c)(1)(A) and (B).

RECEIVED, subject to individually determined rates or contract that have been agreed upon in writing between the carrier and shipper , if applicable , otherwise to the rates, classification and rules that have been established by the carrier and are available to the shipper, on request , and to all applicable state, federal and provincial regulations.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Valspar **Shipper Signature**

SHIPPER SIGNATURE / DATE

I hereby declare that the contents of the consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transportation according to applicable international and national government regulations.

2/23/17

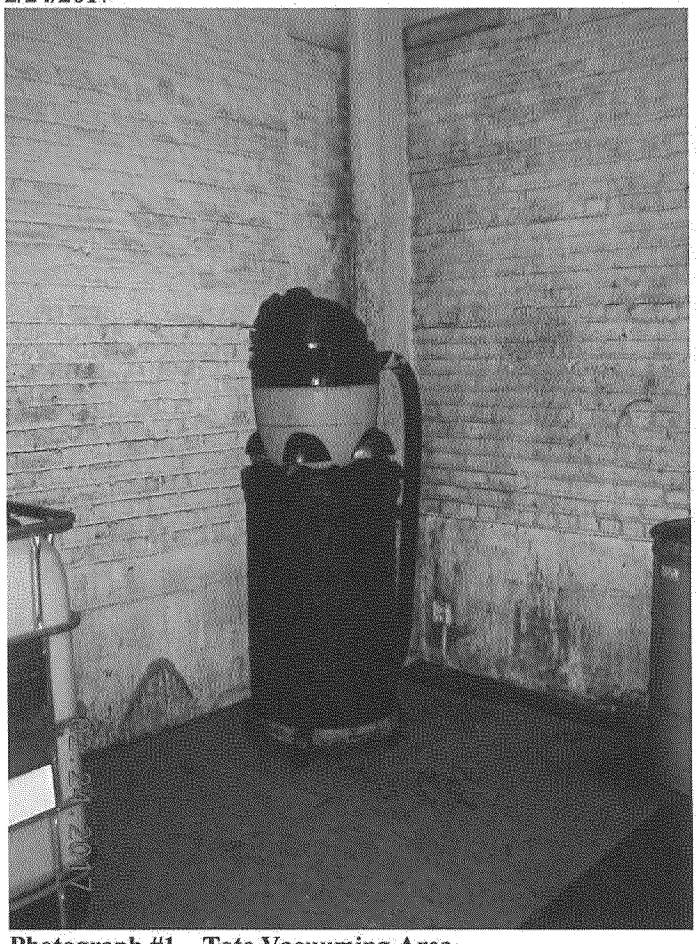
Trailer Loaded:
☐ *By Shipper*
☐ *By Driver*

Freight Counted
☐ *By Shipper*
☐ *By Driver*
☐ *By Driver/pallets said to contain*

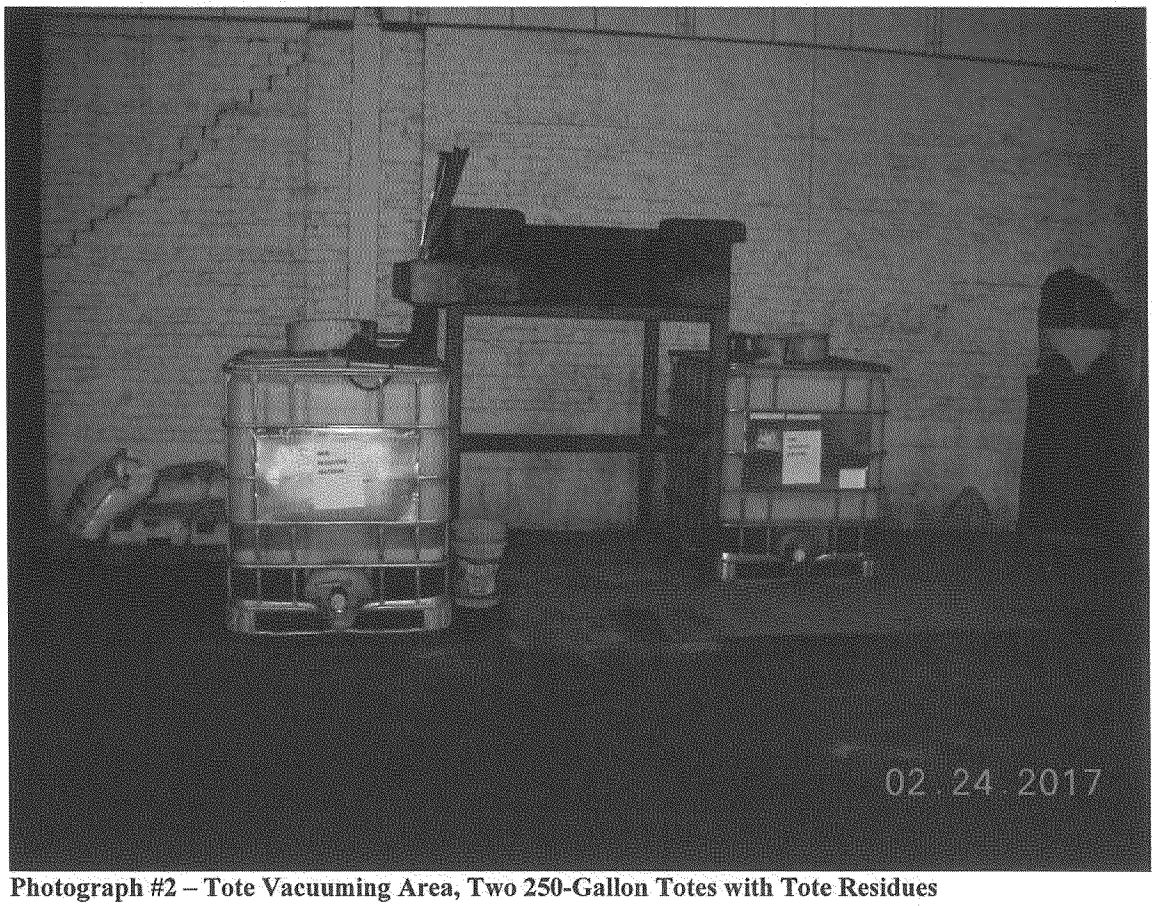
CARRIER SIGNATURE / PICKUP DATE

Carrier acknowledges receipt of packages and required placards. Carrier Certifies emergency response information was made available and / or carrier has the emergency response guidebook or equivalent documentation in the vehicle.
Property described above is received in good order, except as noted.

Mid America IBC
Milwaukee, Wisconsin
2/24/2017



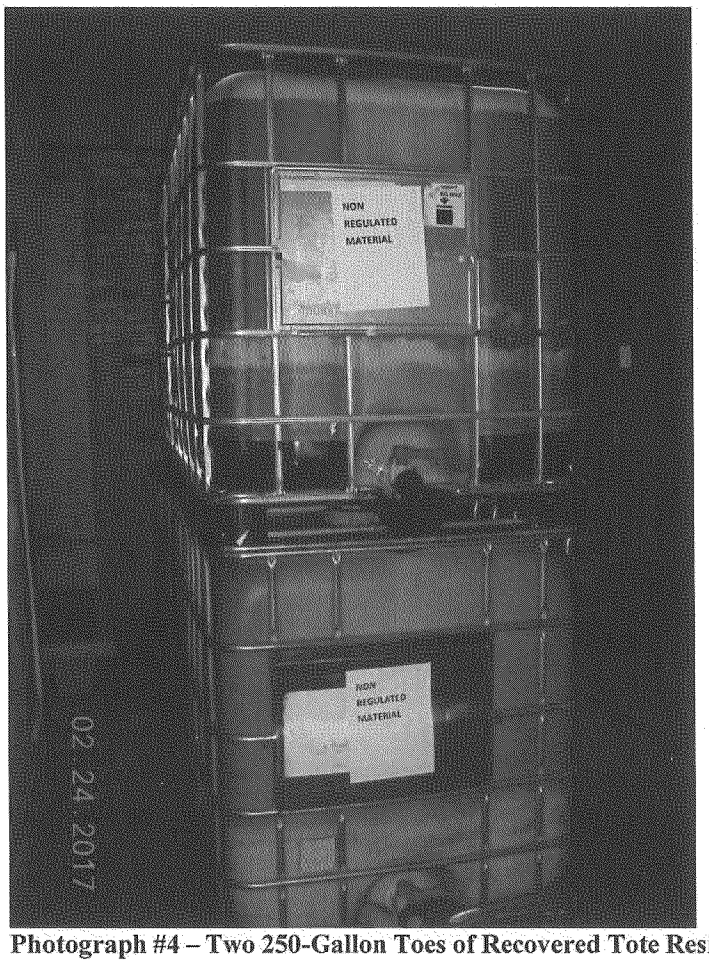
Photograph #1 – Tote Vacuuming Area



Photograph #2 – Tote Vacuuming Area, Two 250-Gallon Totes with Tote Residues

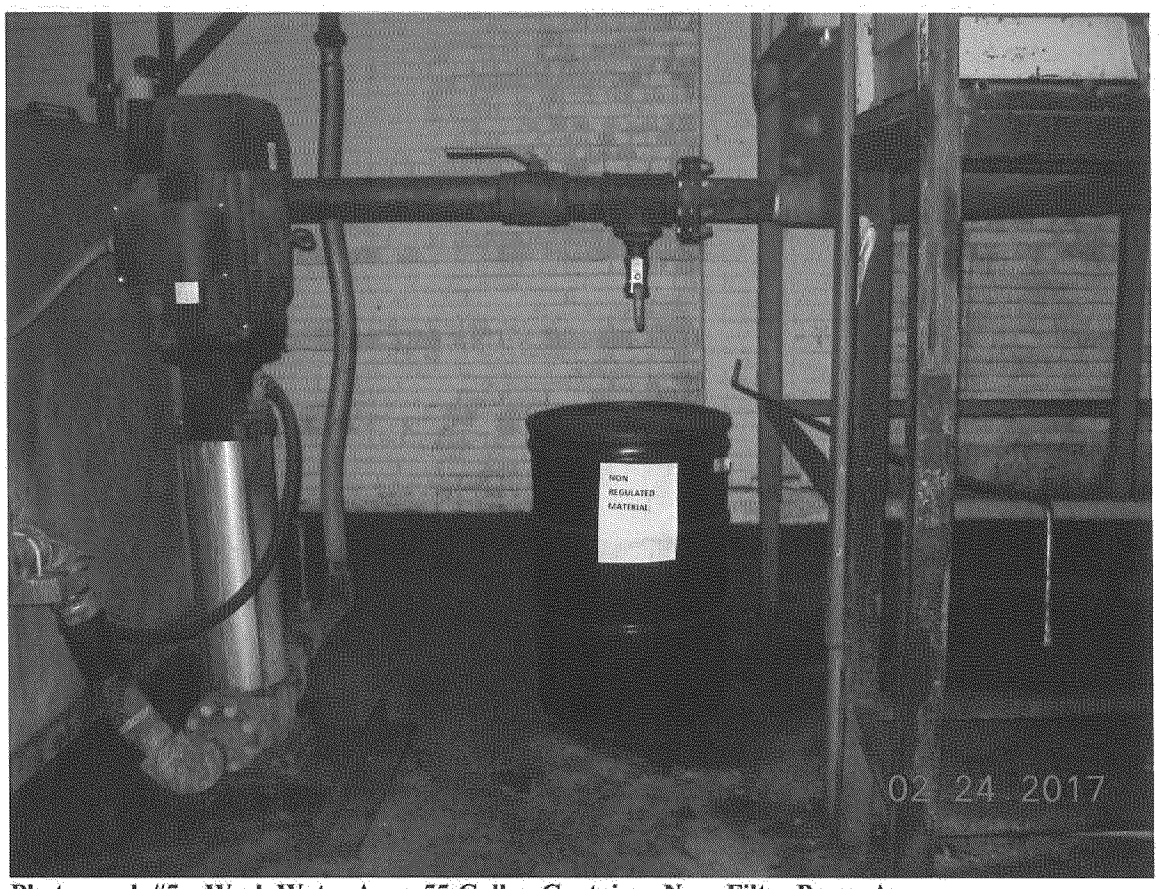
Mid America IBC
Milwaukee, Wisconsin
2/24/2017

Photograph #3 – Wash Water Filter Paper Device



Photograph #4 – Two 250-Gallon Toes of Recovered Tote Residue

Mid America IBC
Milwaukee, Wisconsin
2/24/2017

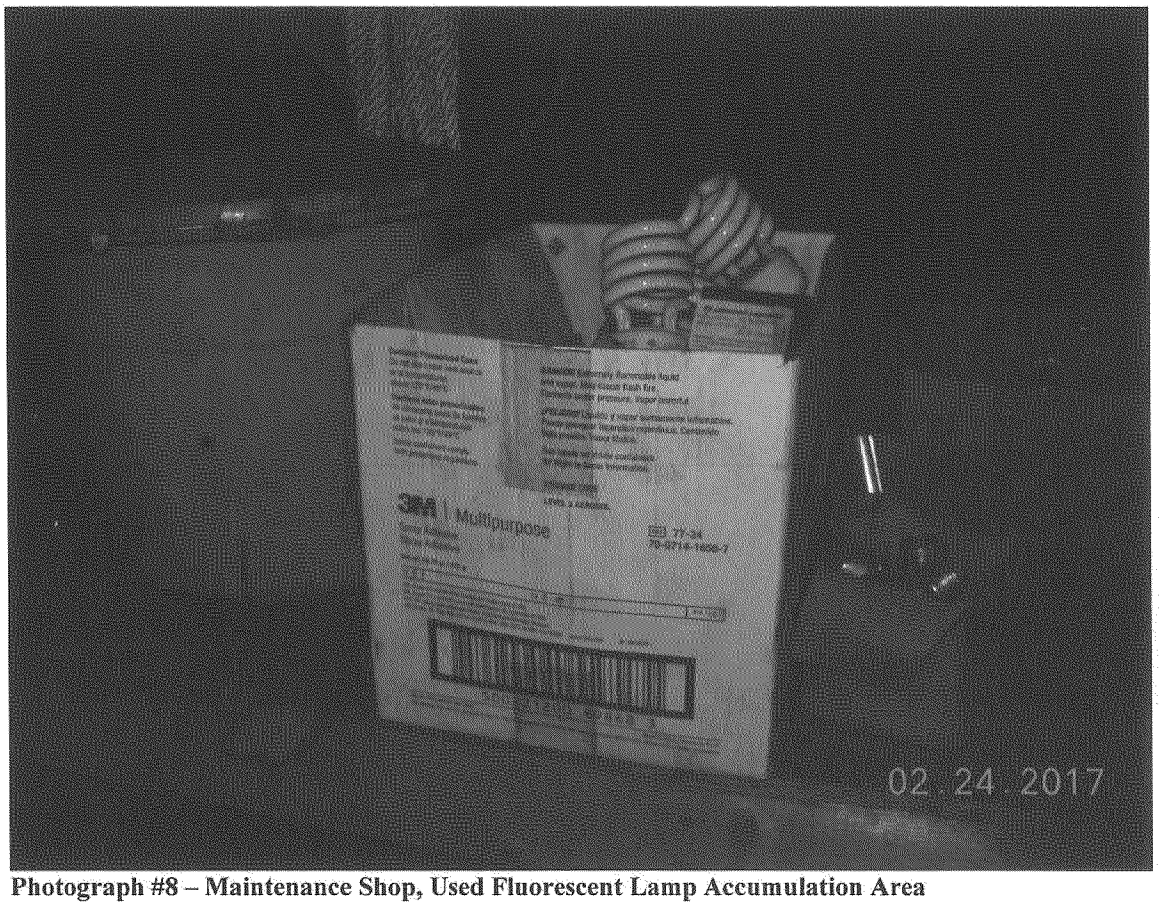


Photograph #5 – Wash Water Area, 55-Gallon Container Near Filter Paper Area

Photograph #6 – Wash Water Area, 55-Gallon Container Near Filter Paper Area

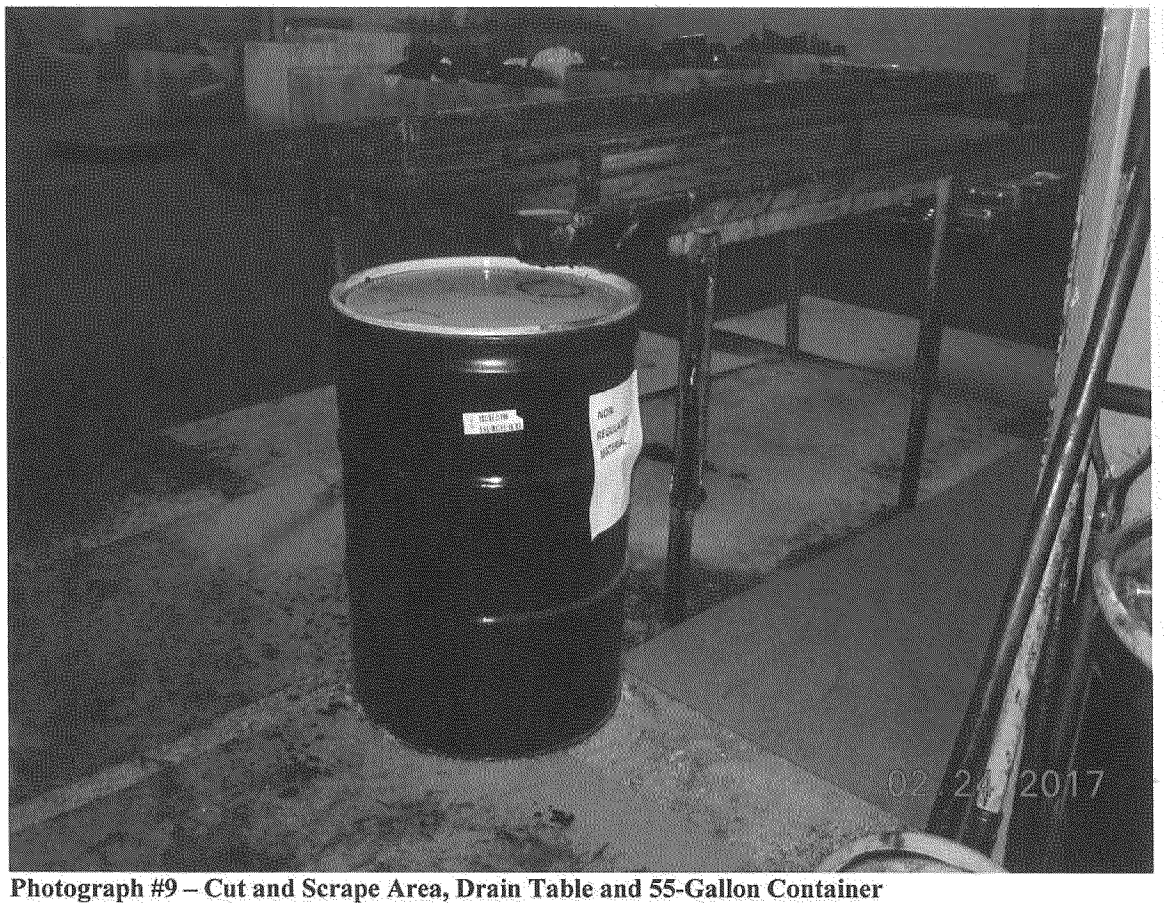
Mid America IBC
Milwaukee, Wisconsin
2/24/2017

Photograph #7 – 250-Gallon Totes Waiting To Be Processed

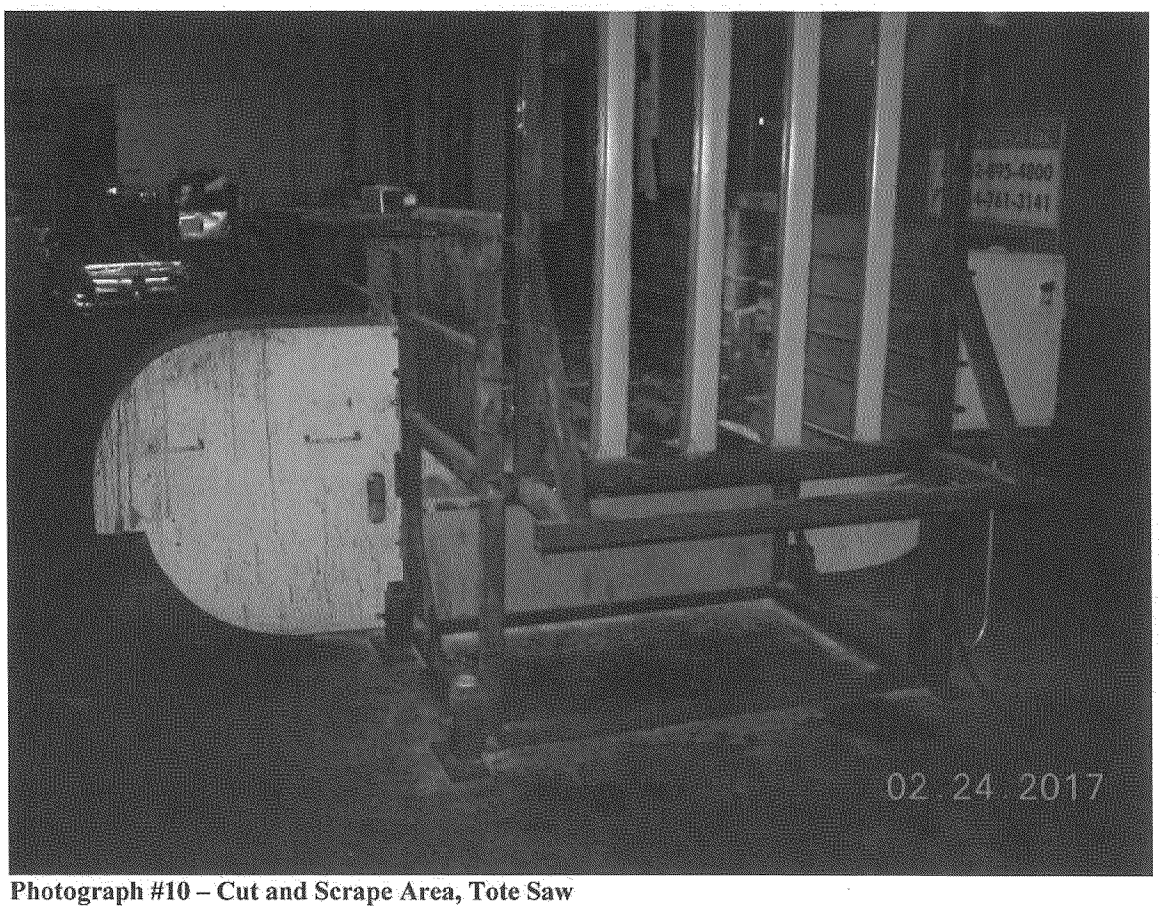


Photograph #8 – Maintenance Shop, Used Fluorescent Lamp Accumulation Area

Mid America IBC
Milwaukee, Wisconsin
2/24/2017

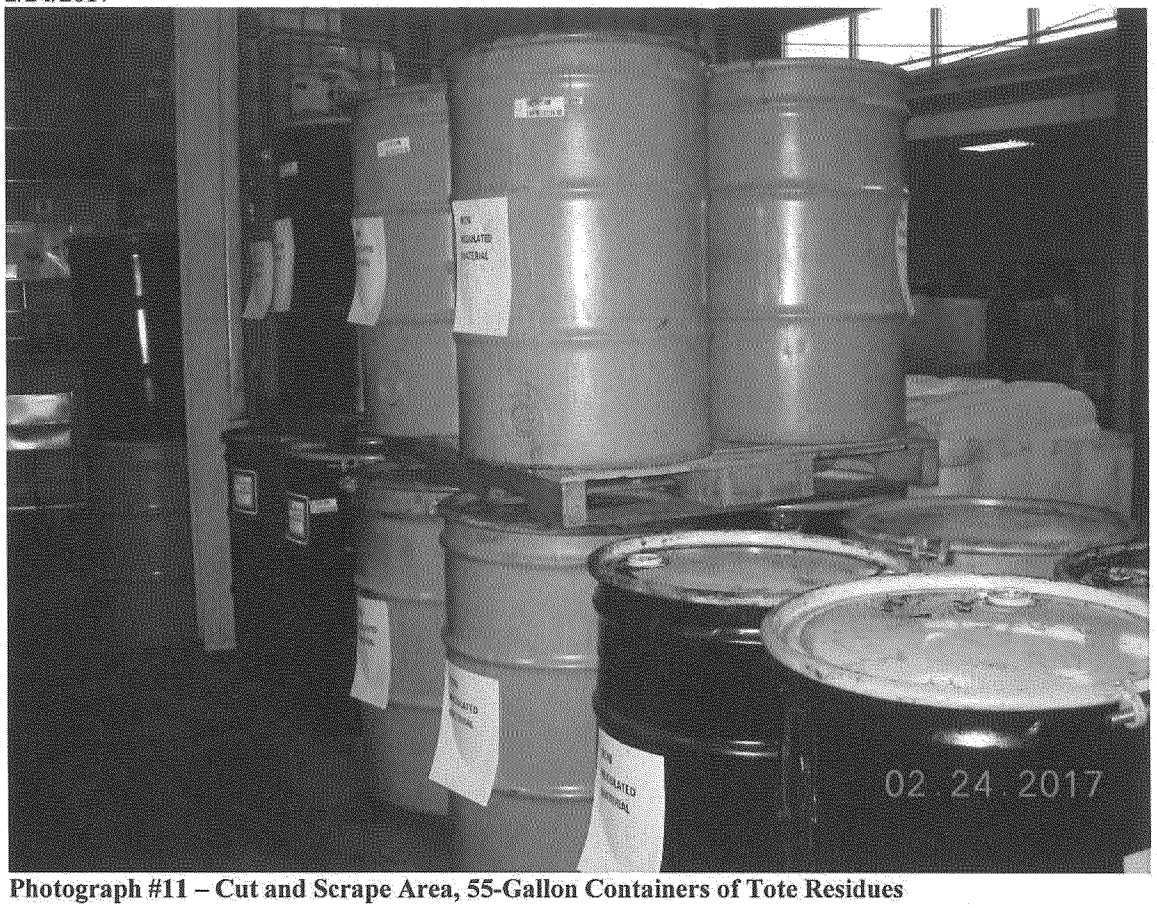


Photograph #9 – Cut and Scrape Area, Drain Table and 55-Gallon Container

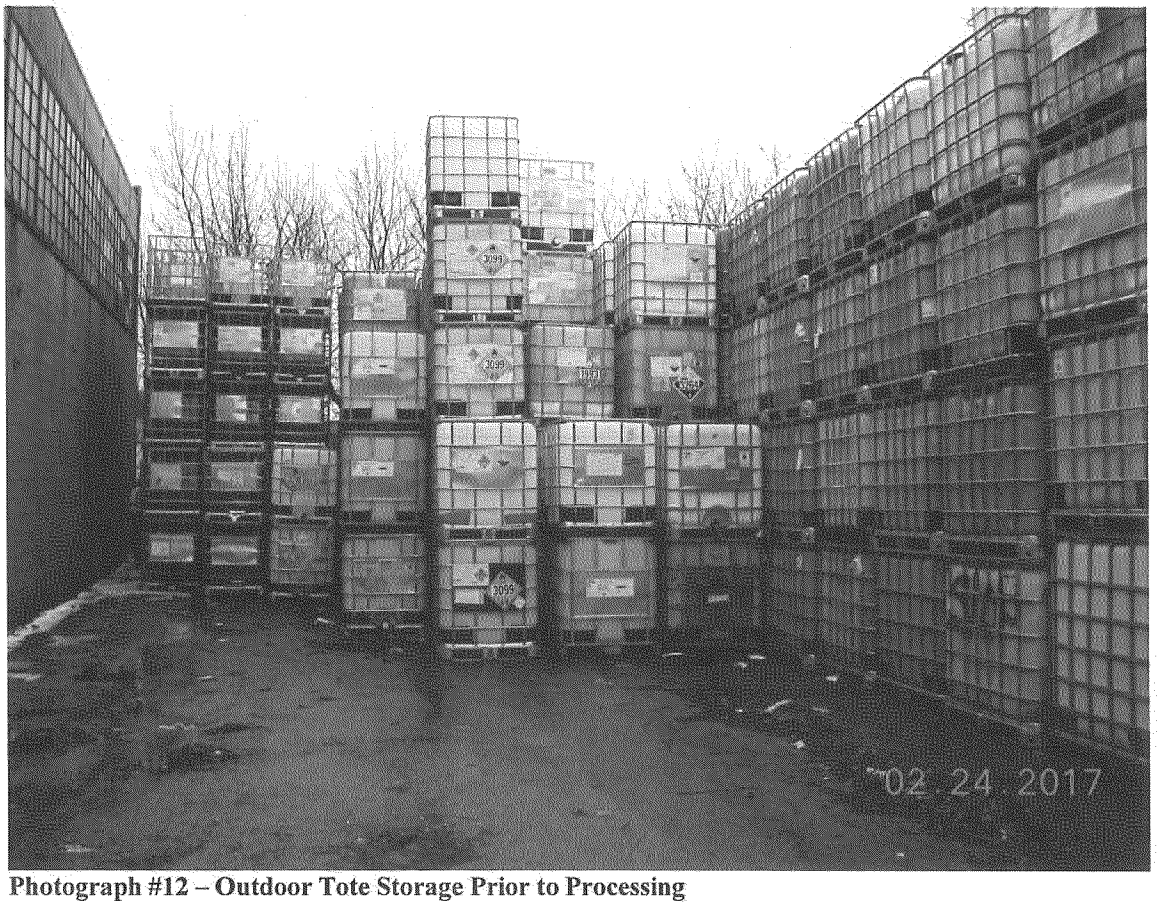


Photograph #10 – Cut and Scrape Area, Tote Saw

Mid America IBC
Milwaukee, Wisconsin
2/24/2017



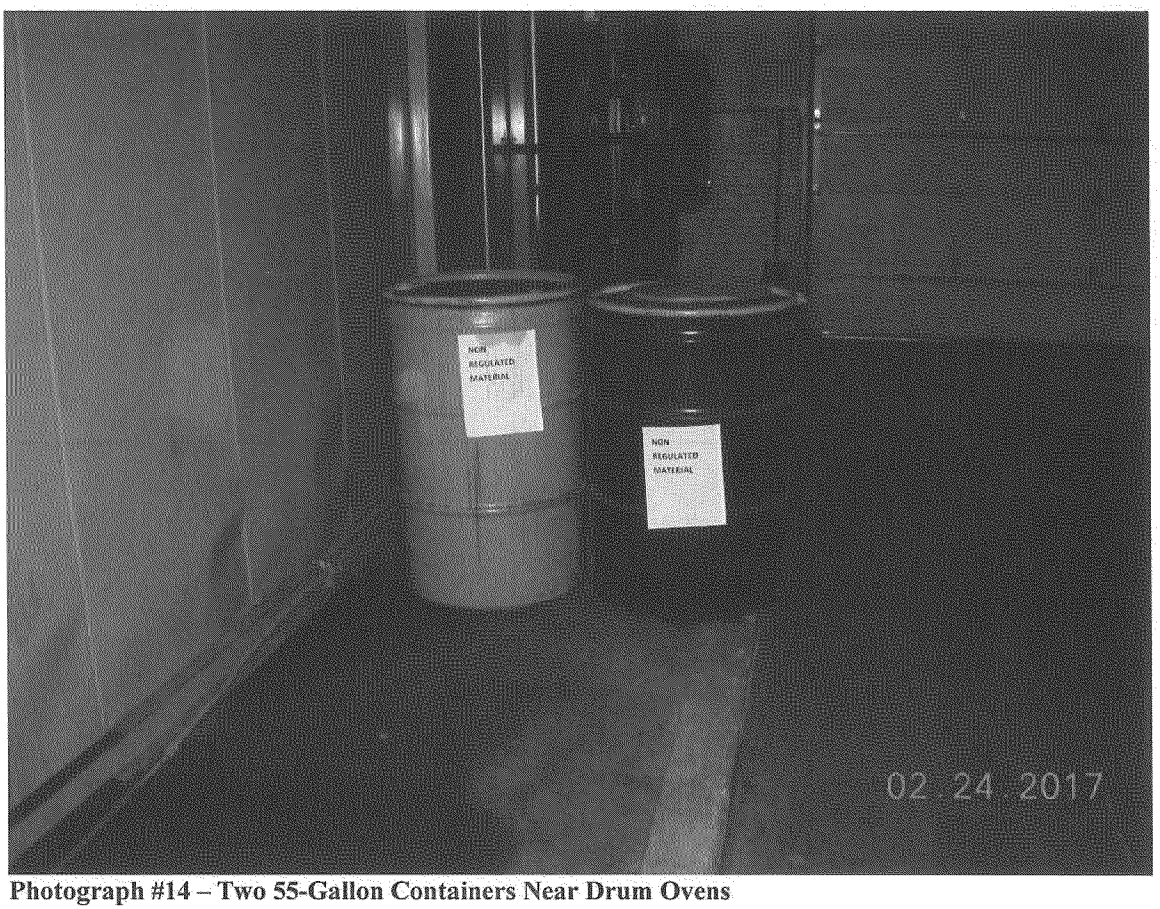
Photograph #11 – Cut and Scrape Area, 55-Gallon Containers of Tote Residues



Photograph #12 – Outdoor Tote Storage Prior to Processing

Mid America IBC
Milwaukee, Wisconsin
2/24/2017

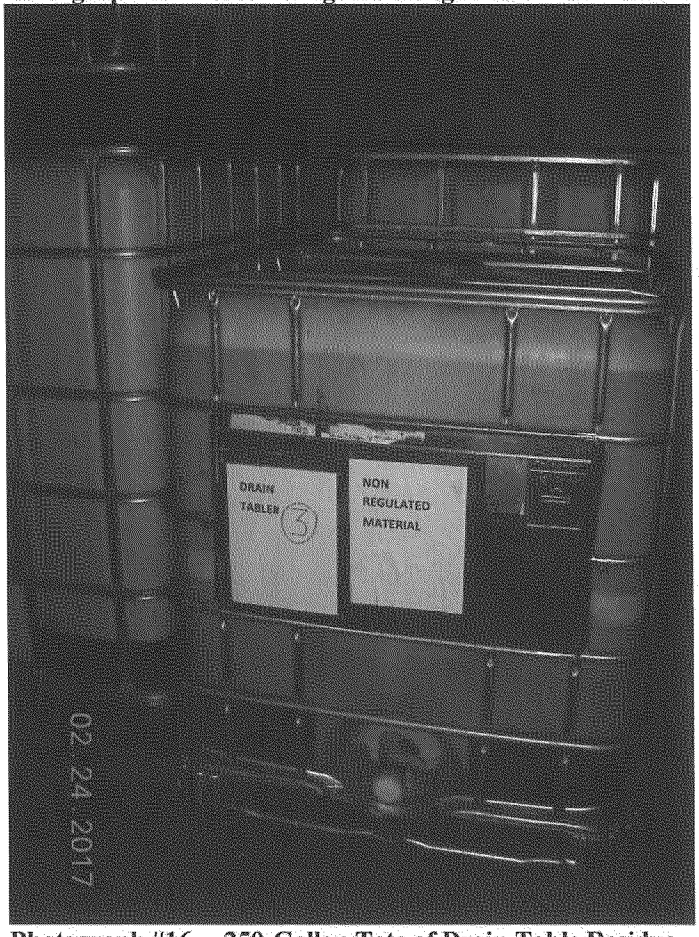
Photograph #13 – Outdoor Tote Storage Prior to Processing (Redacted Company Name)



Photograph #14 – Two 55-Gallon Containers Near Drum Ovens

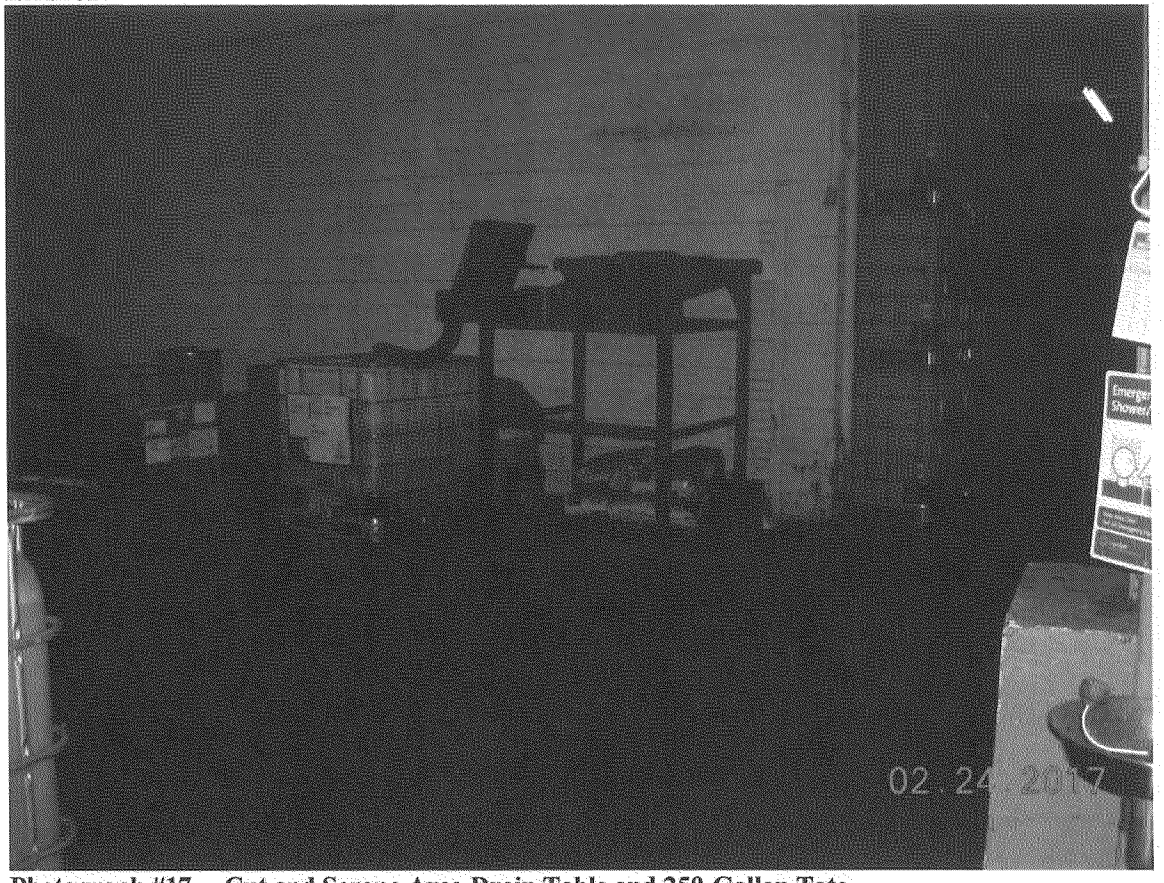
Mid America IBC
Milwaukee, Wisconsin
2/24/2017

Photograph #15 – Old Storage Area Eight 55-Gallon Containers



Photograph #16 – 250-Gallon Tote of Drain Table Residue

Mid America IBC
Milwaukee, Wisconsin
2/24/2017



Photograph #17 – Cut and Scrape Area Drain Table and 250-Gallon Tote

Photograph #18 – Recertified 250-Gallon Tote M4712