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CLIENT/MATTER NUMBER
110874-0109

May 1, 2017

Via E-Mail & FedEx

James Entzminger
United States Environmental Protection Agency
Chemical Emergency Preparedness and Prevention
Section (SC-5J)
77 West Jackson Boulevard
Chicago, IL 60604
Entzminger.James@epa.gov

Re: Response to Request to Provide Information Pursuant to Emergency Planning and Community Right-to-Know Act Dated April 6, 2017- Container Life Cycle Management LLC- Milwaukee facility
CONTAINS CONFIDENTIAL BUSINESS INFORMATION

Dear Mr. Entzminger:

On April 10, 2017, Foley & Lardner LLP received an Emergency Planning and Community Right-to-Know Act Section 311 and 312 Information Request from the United States Environmental Protection Agency ("U.S. EPA") dated April 6, 2017, and directed to the "Mid-America Intermediate Bulk Containers Facility, in Milwaukee Wisconsin" located at 2300 West Cornell Street, Milwaukee, Wisconsin. Container Lifecycle Management LLC ("CLCM") has completed its responses to the Information Request.

Documents responsive to the Information Request are provided as PDFs on the flash drive which will be arriving via FedEx, with a corresponding Table of Contents. 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
EPCRA SECTIONS 311 AND 312 INFORMATION REQUEST

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

May 1, 2017

On April 10, 2017, Foley & Lardner LLP received the United States Environmental Protection Agency's ("U.S. EPA") Emergency Planning and Community Right-to-Know Act, Sections 311 and 312 Information Request dated April 6, 2017 ("Information Request") directed to the "Mid-America Intermediate Bulk Containers Facility, in Milwaukee Wisconsin" located at 2300 West Cornell Street, Milwaukee, Wisconsin (the " CLCM Facility"). Container Lifecycle Management LLC ("CLCM") is a joint venture that purchased the operating assets of the business from Mid-America Steel Drum Co., Inc. on November 4, 2013, and 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.

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 Emergency Planning and Community Right-to-Know 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 the preparation of the answers to this request.*

Response No. 1. Rodney Knash, Kevin Meyer, Steele Johns, Geoff Westphal, Dennis Hoffman, and Lauren Laabs of Mostardi Platt provided information used or considered in the responses to the Information Request or were otherwise consulted in the preparation of the responses to the Information Request.

REQUEST NO. 2. *Identify all documentation consulted, examined, or referred to in the preparation of the answers to this request and provide copies of all such documents.*

Response No. 2. To the extent documents were responsive to this Information Request, they have been provided with this Response. Additionally, certain purchase orders consulted in the preparation of this Response are enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Milwaukee-Q2-000001 to CLCM-EPCRA-Milwaukee-Q2-000031.

REQUEST NO. 3. *What is Mid-America Intermediate Bulk Container (Mid-America IBC)'s Standard Industrial Classification Code?*

Response No. 3. The Standard Industrial Classification Code for the CLCM Facility is 7699 – Repair Shops and Related Services, Not Elsewhere Classified.

REQUEST NO. 4. *What is Mid-America IBC's Dun & Bradstreet number?*

Response No. 4. The CLCM Facility's Dun & Bradstreet number is 04-130-7411.

REQUEST NO. 5. *What are Mid-America IBC's annual sales for the most recently completed fiscal year?*

Response No. 5. CLCM's annual net sales for fiscal year 2016 were $51,148,000.

THE INFORMATION PROVIDED IN RESPONSE TO THIS REQUEST NO. 5 IS CONFIDENTIAL BUSINESS INFORMATION.

REQUEST NO. 6. *How many employees are employed at Mid-America IBC, Milwaukee, Wisconsin?*

Response No. 6. The CLCM Cornell Street Facility has 7 employees.

REQUEST NO. 7. *How many employees are employed at Mid-America Steel Drum corporate wide?*

Response No. 7. CLCM has 120 employees corporate wide.

REQUEST NO. 8. *Is Mid-America IBC a RCRA facility? If so, provide the EPA Identification Number.*

Response No. 8. The CLCM Facility is classified as a Small Quantity Generator ("SQG") with an EPA ID of WIR000162438.

REQUEST NO. 9. *Provide a copy of your emergency plan which outlines the procedures for notification of accidental releases at your facility.*

Response No. 9. A copy of the CLCM Facility's emergency plan is enclosed with this Response and labeled as document Bates No. CLCM-EPCRA-Milwaukee-Q9-000001 to CLCM-EPCRA-Milwaukee-Q9-000036.

REQUEST NO. 10. *Provide documentation regarding the training of your employees on the procedures for notification of accidental releases at your facility.*

Response No. 10. Documentation regarding the CLCM Facility's employee training on the procedures for notification of accidental releases at the CLCM Facility is enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Milwaukee-Q10-000001 to CLCM-EPCRA-Milwaukee-Q10-000030.

REQUEST NO. 11. *Provide the name and current address of the owner(s) of the property located at 2300 West Cornell Street, Milwaukee, Wisconsin, during the time period of January 1, 2013, to the present.*

Response No. 11. CLCM purchased the operating assets at this location on November 4, 2013 and entered into an Agreement of Lease with Mid-America Steel Drum Properties, LLC on that date. To CLCM's knowledge, the owner has not changed during the term of CLCM's lease.

REQUEST NO. 12. *Provide the name and current address of the operator(s) of the facility located at 2300 West Cornell Street, Milwaukee, Wisconsin, during the time period of January 1, 2013, to the present.*

Response No. 12. CLCM has operated this location since November 4, 2013.

REQUEST NO. 13. *When did Mid-America IBC began operations in Milwaukee, Wisconsin?*

Response No. 13. CLCM has operated this location since November 4, 2013. CLCM purchased the operating assets of the business from Mid-America Steel Drum Co., Inc. CLCM does not have knowledge as to when those operations commenced.

REQUEST NO. 14. *If Mid-America IBC was a corporation during the time period of January 1, 2013, to the present, provide a copy of the Articles of Incorporation.*

Response No. 14. CLCM is a limited liability company.

REQUEST NO. 15. *If Mid-America IBC was a subsidiary of a corporation during the time period of January 1, 2013, to the present, identify the parent corporation and provide copies of pertinent documents supporting the subsidiary relationship.*

Response No. 15. CLCM is an indirect joint venture subsidiary of Greif, Inc.

REQUEST NO. 16. *If Mid-America IBC was a division of a corporation during the time period of January 1, 2013, to the present, identify the corporation and provide copies of pertinent documents supporting the claim that this company is a corporate division.*

Response No. 16. CLCM is not a corporate division.

REQUEST NO. 17. *If Mid-America IBC was a partnership during the time period of January 1, 2013, to the present, provide a copy of the partnership agreement.*

Response No. 17. CLCM is a limited liability company.

REQUEST NO. 18. *If Mid-America IBC was a trust during the time period of January 1, 2013, to the present, provide all relevant agreements and documents to support this claim.*

Response No. 18. CLCM is not a trust.

REQUEST NO. 19. *Did Mid-America IBC supply copies of all Material Safety Data Sheets (MSDSs), or a list of hazardous chemicals, for materials stored at this facility above a Threshold Planning Quantity (TPQ) and/or Reporting Threshold to the Wisconsin State Emergency Response Commission on or before October 17, 1987, or 90 days from the date the hazardous chemical became present at this facility? If so, provide documentation to support your claim.*

Response No. 19. CLCM did not own the CLCM Facility prior to October 17, 1987, therefore CLCM cannot provide answers for that time period. From 2013 through the present time period, CLCM is unaware of any chemicals stored onsite that exceeded a Threshold Planning Quantity and/or Reporting Threshold.

REQUEST NO. 20. *Did Mid-America IBC supply copies of all MSDSs, or a list of hazardous chemicals, for materials stored at this facility above a TPQ and/or Reporting Threshold to the Milwaukee County Local Emergency Planning Committee on or before October 17, 1987, or 90 days from the date the hazardous chemicals became present at this facility? If so, provide documentation to support your claim.*

Response No. 20. CLCM did not own the CLCM Facility prior to October 17, 1987, therefore CLCM cannot provide answers for that time period. From 2013 through the present time period, CLCM is unaware of any chemicals stored onsite that exceeded a Threshold Planning Quantity and/or Reporting Threshold.

REQUEST NO. 21. *Did Mid-America IBC supply copies of all MSDSs, or a list of hazardous chemicals, for materials stored at this facility above a TPQ and/or Reporting Threshold to the Milwaukee Fire Department on or before October 17, 1987, or 90 days from the date the hazardous chemical became present at this facility? If so, provide documentation to support your claim.*

Response No. 21. CLCM did not own the CLCM Facility prior to October 17, 1987, therefore CLCM cannot provide answers for that time period. From 2013 through the present time period, CLCM is unaware of any chemicals stored onsite that exceeded a Threshold Planning Quantity and/or Reporting Threshold.

REQUEST NO. 22. *Was Mid-America IBC conducting business at 2300 West Cornell Street, Milwaukee, Wisconsin, during the time period of January 1, 2013, to December 31, 2013? If so, please respond to the following information requests:*

(a) Did Mid-America IBC use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2013, to December 31, 2013?;

(b) If Mid-America IBC did use, produce, manufacture, and/or store any hazardous chemicals at this location, provide a list of such hazardous chemicals and the maximum quantity stored at this facility at any one given time during the period of January 1, 2013, to December 31, 2013;

(c) *For each hazardous chemical listed in number 22(b), provide an MSDS. If you already provided an MSDS for a hazardous chemical during the February 24, 2017, inspection, you need not provide another one for the same hazardous chemical;*

(d) *Provide a copy of the Tier One or Tier Two form required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2013, to December 31, 2013;*

(e) *Did Mid-America IBC supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Wisconsin State Emergency Response Commission for the period of January 1, 2013, to December 31, 2013, on or before March 1, 2014? If so, provide documentation to support your claim;*

(f) *Did Mid-America IBC supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee County Local Emergency Planning Committee for the period of January 1, 2013, to December 31, 2013, on or before March 1, 2014? If so, provide documentation to support your claim;*

(g) *Did Mid-America IBC supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee Fire Department for the period of January 1, 2013, to December 31, 2013, on or before March 1, 2014? If so, provide documentation to support your claim.*

Response No. 22. CLCM conducted business at 2300 West Cornell Street, Milwaukee, Wisconsin, during the time period of January 1, 2013, to December 31, 2013.

(a) The CLCM Facility did use, produce, manufacture, and/or store hazardous chemicals at this location during the period of January 1, 2013, to December 31, 2013.

(b) A list of the chemicals stored and the quantities stored during the period of January 1, 2013 to December 31, 2013 is enclosed with this Response and labeled as document Bates No. CLCM-EPCRA-Milwaukee-Q22(b)-000001.

(c) MSDS for the chemicals listed in 22(b) are enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Milwaukee-Q22(c)-000001 to Bates No. CLCM-EPCRA-Milwaukee-Q22(c)-000042.

(d) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2013 to December 31, 2013. However, the CLCM Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for sulfuric acid at any point in 2013, 2014 or 2015.

The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

(e) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2013 to December 31, 2013. However, the Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for sulfuric acid at any point in 2013, 2014 or 2015. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

(f) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2013 to December 31, 2013. However, the Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for sulfuric acid at any point in 2013, 2014 or 2015. The CLCM Facility will promptly submit the applicable reports, if the Facility determines that such reports were required.

(g) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2013 to December 31, 2013. However, the CLCM Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for sulfuric acid at any point in 2013, 2014 or 2015. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

REQUEST NO. 23. *Was Mid-America IBC conducting business at 2300 West Cornell Street, Milwaukee, Wisconsin, during the time period of January 1, 2014, to December 31, 2014? If so, please respond to the following information requests:*

(a) Did Mid-America IBC use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2014, to December 31, 2014?;

(b) If Mid-America IBC did use, produce, manufacture, and/or store any hazardous chemicals at this location, provide a list of such hazardous chemicals and the maximum quantity stored at this facility at any one given time during the period of January 1, 2014, to December 31, 2014;

(c) For each hazardous chemical listed in number 23(b), provide an MSDS. If you already provided an MSDS for a hazardous chemical during the February 24, 2017 inspection or in information request number 22, you need not provide another one for the same hazardous chemical;

(d) Provide a copy of the Tier One or Tier Two form required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2014, to December 31, 2014;

(e) *Did Mid-America IBC supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Wisconsin State Emergency Response Commission for the period of January 1, 2014, to December 31, 2014, on or before March 1, 2015? If so, provide documentation to support your claim;*

(f) *Did Mid-America IBC supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee County Local Emergency Planning Committee for the period of January 1, 2014, to December 31, 2014, on or before March 1, 2015? If so, provide documentation to support your claim;*

(g) *Did Mid-America IBC supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee Fire Department for the period of January 1, 2014, to December 31, 2014, on or before March 1, 2015? If so, provide documentation to support your claim.*

Response No. 23. CLCM conducted business at 2300 West Cornell Street, Milwaukee, Wisconsin, during the time period of January 1, 2014, to December 31, 2014.

(a) The CLCM Facility did use, produce, manufacture, and/or store hazardous chemicals at this location during the period of January 1, 2014, to December 31, 2014.

(b) A list of the chemicals stored and the quantities stored during the period of January 1, 2014 to December 31, 2014 is enclosed with this Response and labeled as document Bates No. CLCM-EPCRA-Milwaukee-Q23(b)-000001.

(c) MSDS for the chemicals listed in 23(b) are enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Milwaukee-Q22(c)-000001 to Bates No. CLCM-EPCRA-Milwaukee-Q22(c)-000033.

(d) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2014 to December 31, 2014. However, the CLCM Facility is currently evaluating whether the Facility exceeded reporting thresholds for sulfuric acid at any point in 2013, 2014 or 2015. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

(e) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2014 to December 31, 2014. However, the CLCM Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for sulfuric acid at any point in 2013, 2014 or 2015. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

(f) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2014 to December 31, 2014. However, the CLCM Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for sulfuric acid at any point in 2013, 2014 or 2015. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

(g) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2014 to December 31, 2014. However, the CLCM Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for sulfuric acid at any point in 2013, 2014 or 2015. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

REQUEST NO. 24. *Was Mid-America IBC conducting business at 2300 West Cornell Street, Milwaukee, Wisconsin, during the time period of January 1, 2015, to December 31, 2015? If so, please respond to the following information requests:*

(a) Did Mid-America IBC use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2015, to December 31, 2015?;

(b) If Mid-America IBC did use, produce, manufacture, and/or store any hazardous chemicals at this location, provide a list of such hazardous chemicals and the maximum quantity stored at this facility at any one given time during the period of January 1, 2015, to December 31, 2015;

(c) For each hazardous chemical listed in number 24(b), provide an MSDS. If you already provided an MSDS for a hazardous chemical during the February 24, 2017 inspection or in information request number 22 or 23, you need not provide another one for the same hazardous chemical;

(d) Provide a copy of the Tier One or Tier Two form required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2015, to December 31, 2015;

(e) Did Mid-America IBC supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Wisconsin State Emergency Response Commission for the period of January 1, 2015, to December 31, 2015, on or before March 1, 2016? If so, provide documentation to support your claim;

(f) Did Mid-America IBC supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee County Local Emergency Planning Committee for the period of January 1,

2015, to December 31, 2015, on or before March 1, 2016? If so, provide documentation to support your claim;

(g) *Did Mid-America IBC supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee Fire Department for the period of January 1, 2015, to December 31, 2015, on or before March 1, 2016? If so, provide documentation to support your claim.*

Response No. 24. CLCM conducted business at 2300 West Cornell Street, Milwaukee, Wisconsin, during the time period of January 1, 2015, to December 31, 2015.

(a) The CLCM Facility did use, produce, manufacture, and/or store hazardous chemicals at this location during the period of January 1, 2015, to December 31, 2015.

(b) A list of the chemicals stored and the quantities stored during the period of January 1, 2015 to December 31, 2015 is enclosed with this Response and labeled as document Bates No. CLCM-EPCRA-Milwaukee-Q24(b)-000001.

(c) MSDS for the chemicals listed in 24(b) are enclosed with this Response and labeled as documents CLCM-EPCRA-Milwaukee-Q22(c)-000001 to Bates No. CLCM-EPCRA-Milwaukee-Q22(c)-000035.

(d) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2015 to December 31, 2015. However, the CLCM Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for sulfuric acid at any point in 2013, 2014 or 2015. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

(e) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2015 to December 31, 2015. However, the CLCM Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for sulfuric acid at any point in 2013, 2014 or 2015. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

(f) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2015 to December 31, 2015. However, the Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for sulfuric acid at any point in 2013, 2014 or 2015. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

(g) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2015 to December 31, 2015. However, the CLCM Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for sulfuric acid at any point in 2013, 2014 or 2015. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

REQUEST NO. 25. *Was Mid-America IBC conducting business at 2300 West Cornell Street, Milwaukee, Wisconsin, during the time period of January 1, 2016, to December 31, 2016? If so, please respond to the following information requests:*

(a) Did Mid-America IBC use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2016, to December 31, 2016?;

(b) If Mid-America IBC did use, produce, manufacture, and/or store any hazardous chemicals at this location, provide a list of such hazardous chemicals and the maximum quantity stored at this facility at any one given time during the period of January 1, 2016, to December 31, 2016;

(c) For each hazardous chemical listed in number 25(b), provide an MSDS. If you already provided an MSDS for a hazardous chemical during the February 24, 2017 inspection or in information request number 22, 23, or 24, you need not provide another one for the same hazardous chemical;

(d) Provide a copy of the Tier One or Tier Two form required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2016, to December 31, 2016;

(e) Did Mid-America IBC supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Wisconsin State Emergency Response Commission for the period of January 1, 2016, to December 31, 2016, on or before March 1, 2017? If so, provide documentation to support your claim;

(f) Did Mid-America IBC supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee County Local Emergency Planning Committee for the period of January 1, 2016, to December 31, 2016, on or before March 1, 2017? If so, provide documentation to support your claim;

(g) Did Mid-America IBC supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee Fire Department for the period of January 1, 2016, to December 31, 2016, on or before March 1, 2017? If so, provide documentation to support your claim.

Response No. 25. CLCM conducted business at 2300 West Cornell Street, Milwaukee, Wisconsin, during the time period of January 1, 2016, to December 31, 2016.

(a) The CLCM Facility did use, produce, manufacture, and/or store hazardous chemicals at this location during the period of January 1, 2016, to December 31, 2016.

(b) A list of the chemicals stored and the quantities stored during the period of January 1, 2015 to December 31, 2015 is enclosed with this Response and labeled as document Bates No. CLCM-EPCRA-Milwaukee-Q25(b)-000001.

(c) MSDS for the chemicals listed in 25(b) are enclosed with this Response and labeled as documents CLCM-EPCRA-Milwaukee-Q22(c)-000001 to Bates No. CLCM-EPCRA-Milwaukee-Q22(c)-000035.

(d) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2016 to December 31, 2016.

(e) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2016 to December 31, 2016.

(f) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2016 to December 31, 2016.

(g) No Tier One or Tier Two form was completed for the CLCM Facility for the period of January 1, 2016 to December 31, 2016.

AS TO OBJECTIONS:

CONTAINER LIFE CYCLE MANAGEMENT LLC

Dated: May 1, 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 of and am familiar with the facility owned by Container Life Cycle Management LLC ("CLCM") located at 2300 West Cornell Street, Milwaukee, 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 Sections 311 and 312 of the Emergency Planning and Community Right-to-Know Act for information regarding the facility located at 2300 West Cornell Street, Milwaukee, Wisconsin dated May 1, 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.

Kevin Meyer
Plant Manager

Subscribed and sworn to before me
this 1 day of May, 2017

NOTARY PUBLIC, State of Wisconsin
My Commission is/expires: 1-17-2020

SHERRY L KANNENBERG
Notary Public
State of Wisconsin