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: Julie Morris — 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: 800/842-9792 (AWC)
4. Manifest Tracking Number: 012532568 JJK

5. Generator's Name and Mailing Address
Mid-America Steel Drum Co.
2300 W. Cornell St.
Milwaukee, WI 53209
Generator's Phone: (414) 235-0283 Claire

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
	1. Non RCRA regulated, Non DOT hazardous Liquid material	001	TT	5200	G	NONE
	2. WASTE WATER					
	3. 03-07-14					
	4.					

14. Special Handling Instructions and Additional Information
Profile # L 047405-0-8-24W

Trailer #
Generator Representative Signature On-Board
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

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

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

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

GENERATOR | INTL | TRANSPORTER | DESIGNATED FACILITY

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 RK
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

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

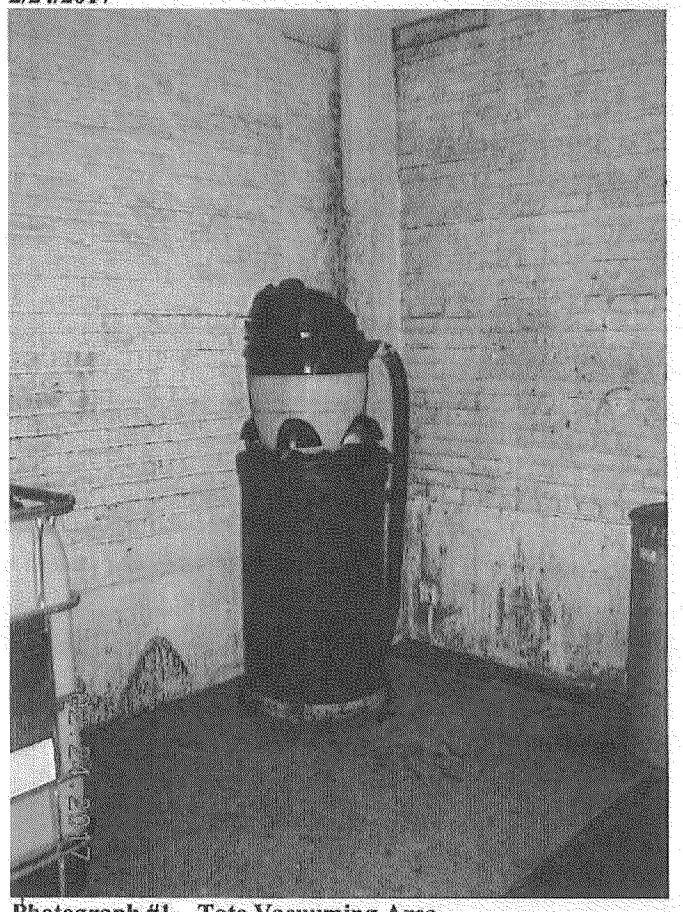
Trailer Loaded:
☐ *By Shipper*
☐ *By Driver*

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

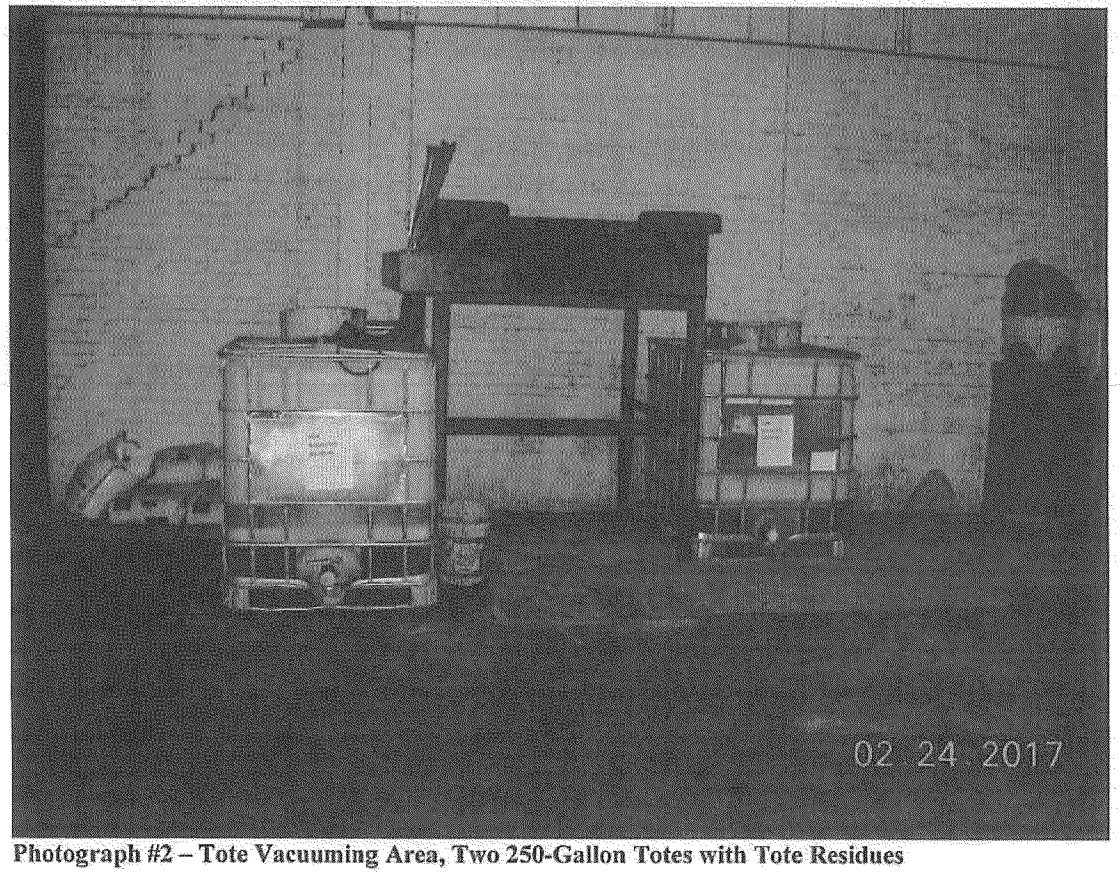
CARRIER SIGNATURE / PICKUP DATE

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



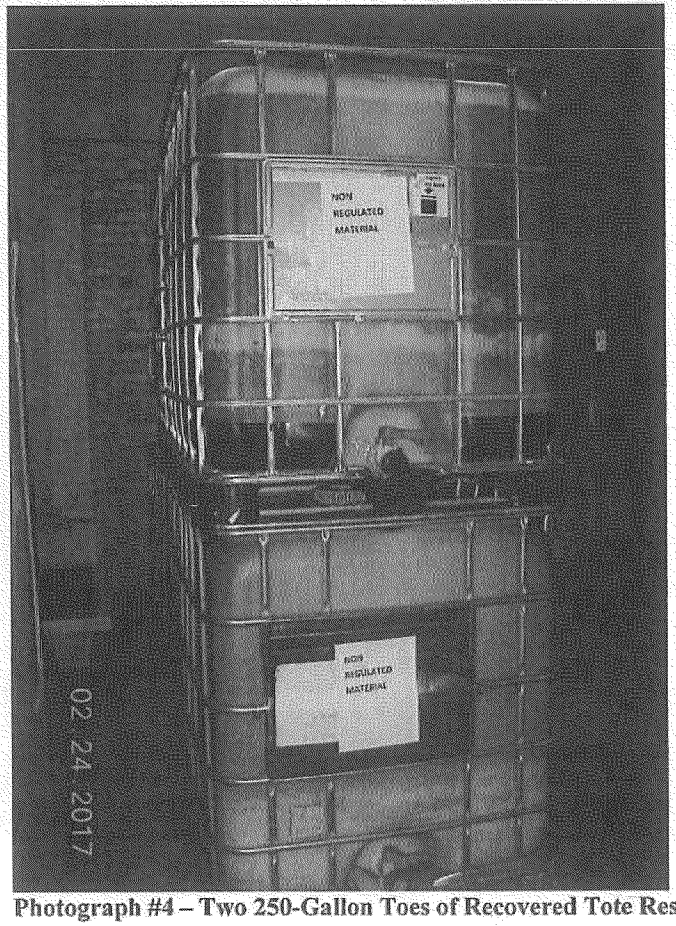
Photograph #1 – Tote Vacuuming Area



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

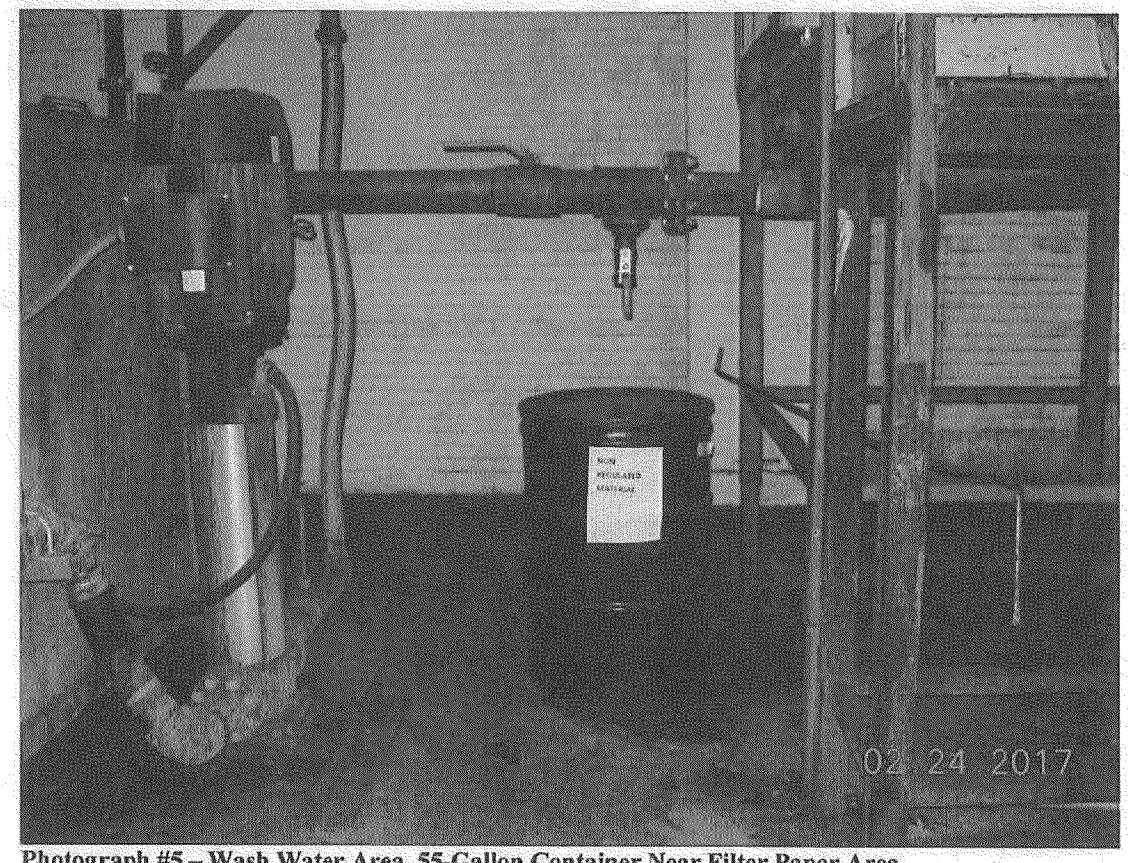
Mid America IBC
Milwaukee, Wisconsin
2/24/2017

Photograph #3 – Wash Water Filter Paper Device

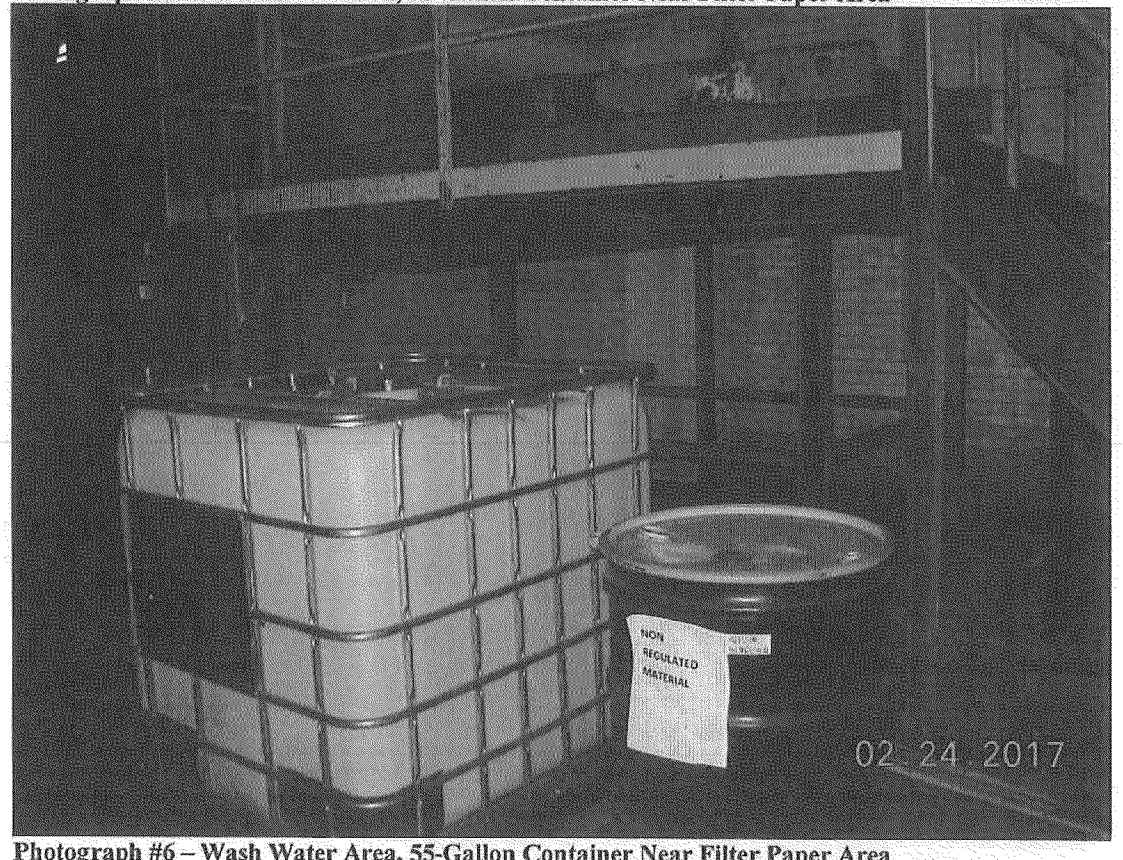


Photograph #4 – Two 250-Gallon Toes of Recovered Tote Residue

Mid America IBC
Milwaukee, Wisconsin
2/24/2017

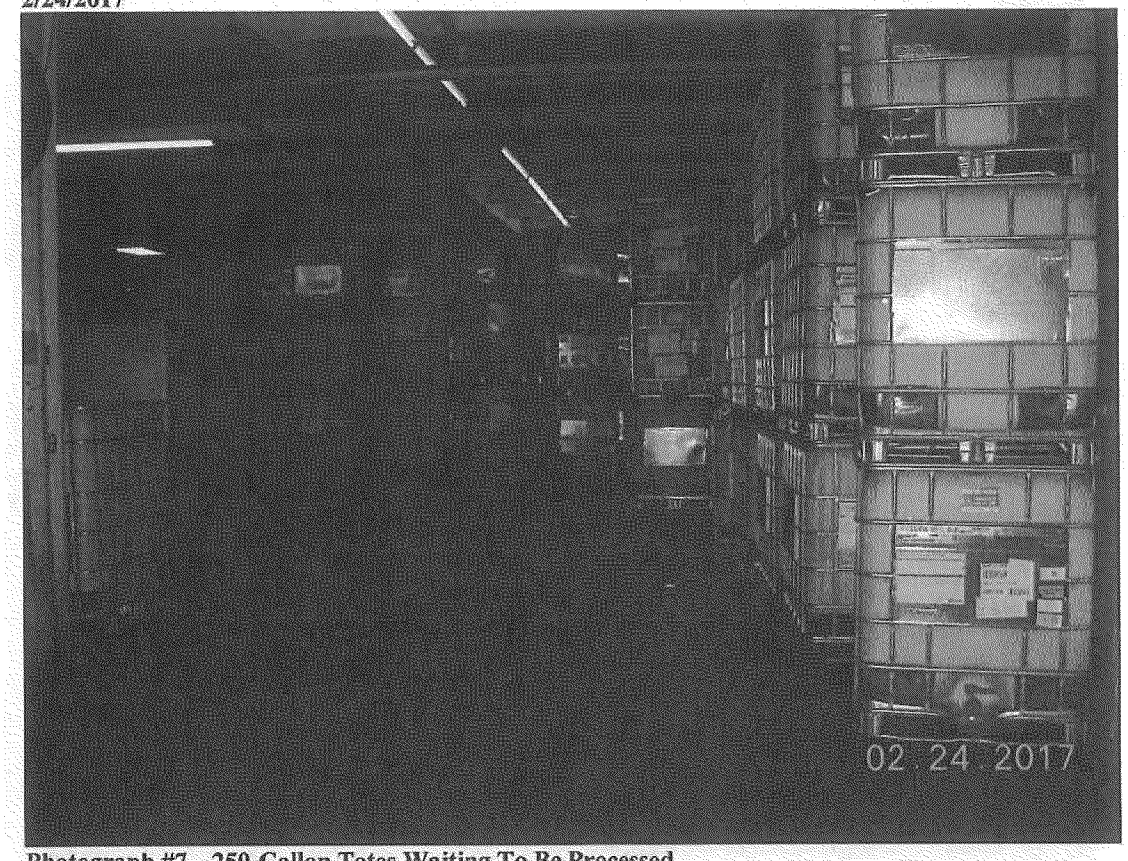


Photograph #5 – Wash Water Area, 55-Gallon Container Near Filter Paper Area

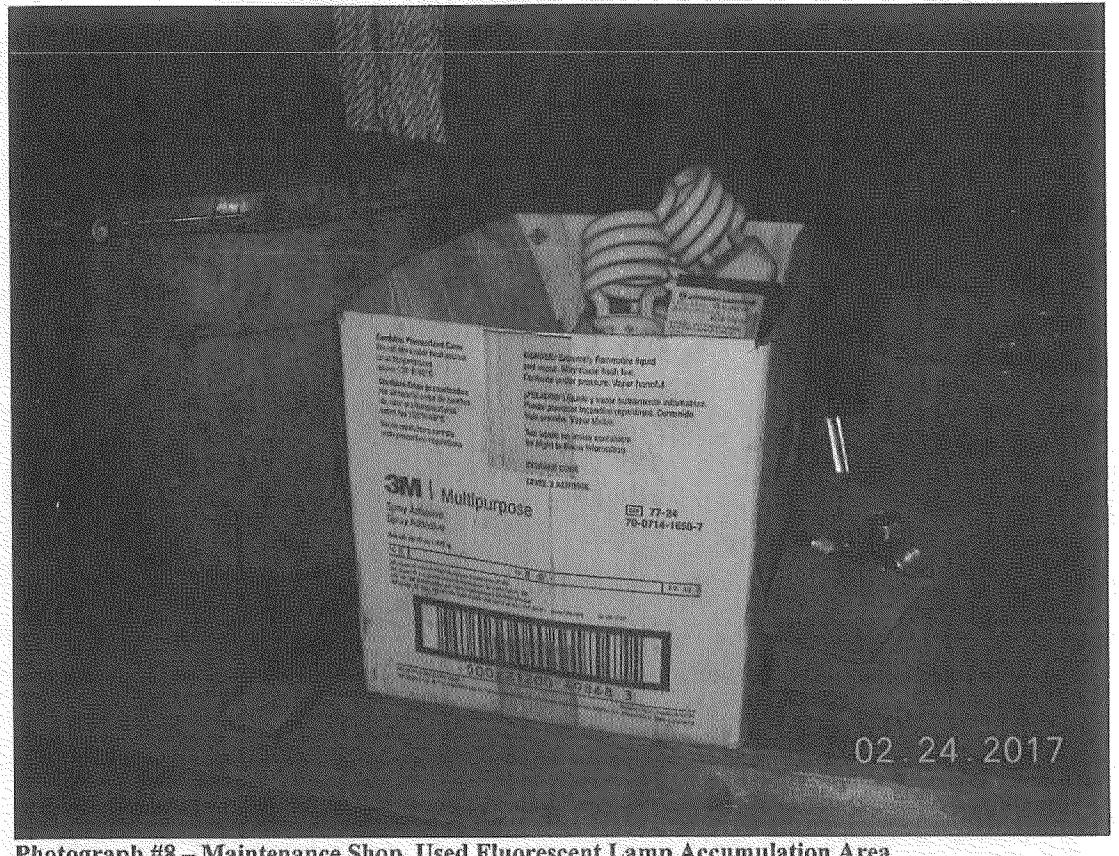


Photograph #6 – Wash Water Area, 55-Gallon Container Near Filter Paper Area

Mid America IBC
Milwaukee, Wisconsin
2/24/2017

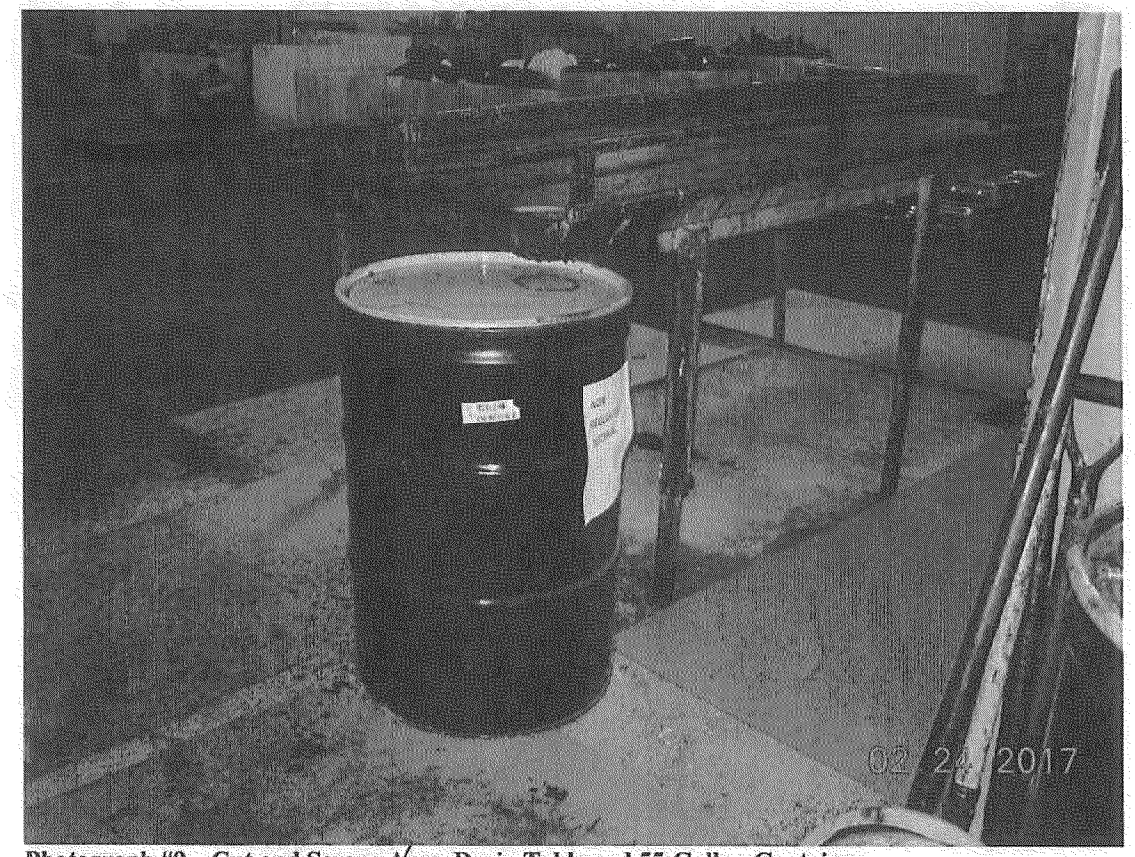


Photograph #7 – 250-Gallon Totes Waiting To Be Processed

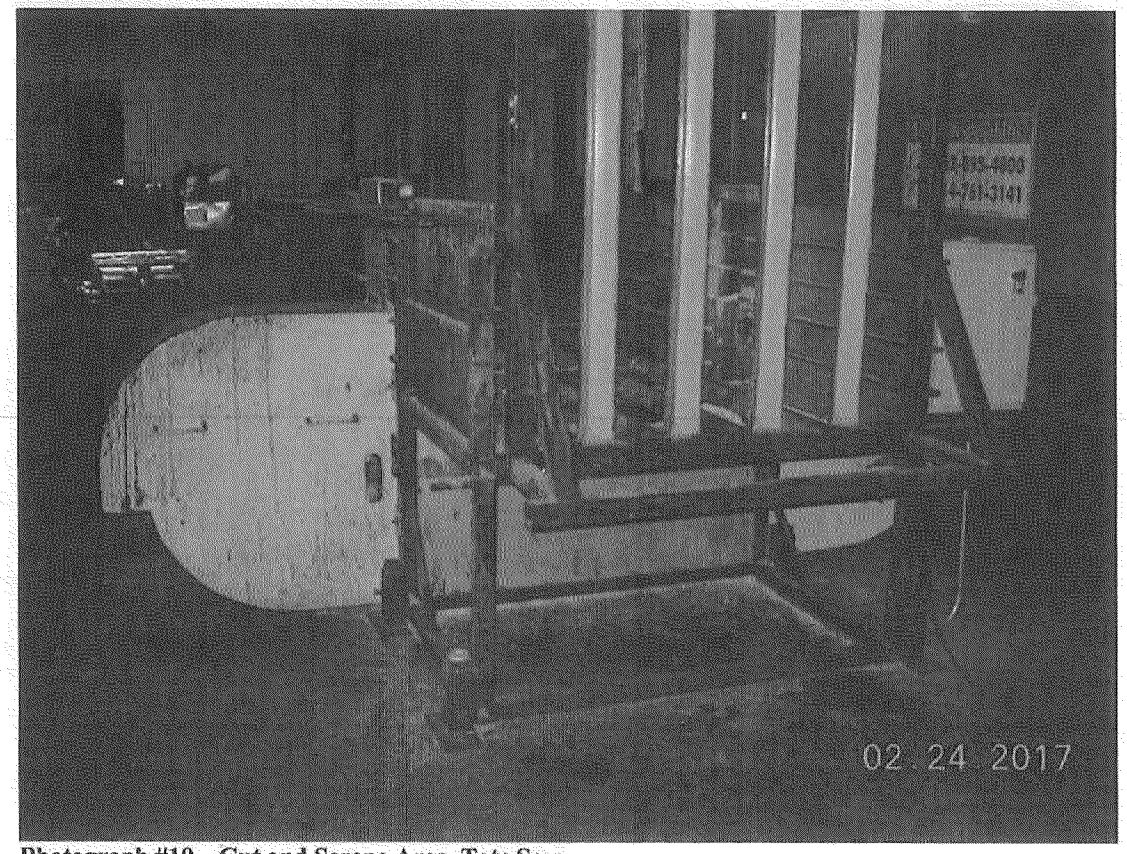


Photograph #8 – Maintenance Shop, Used Fluorescent Lamp Accumulation Area

Mid America IBC
Milwaukee, Wisconsin
2/24/2017

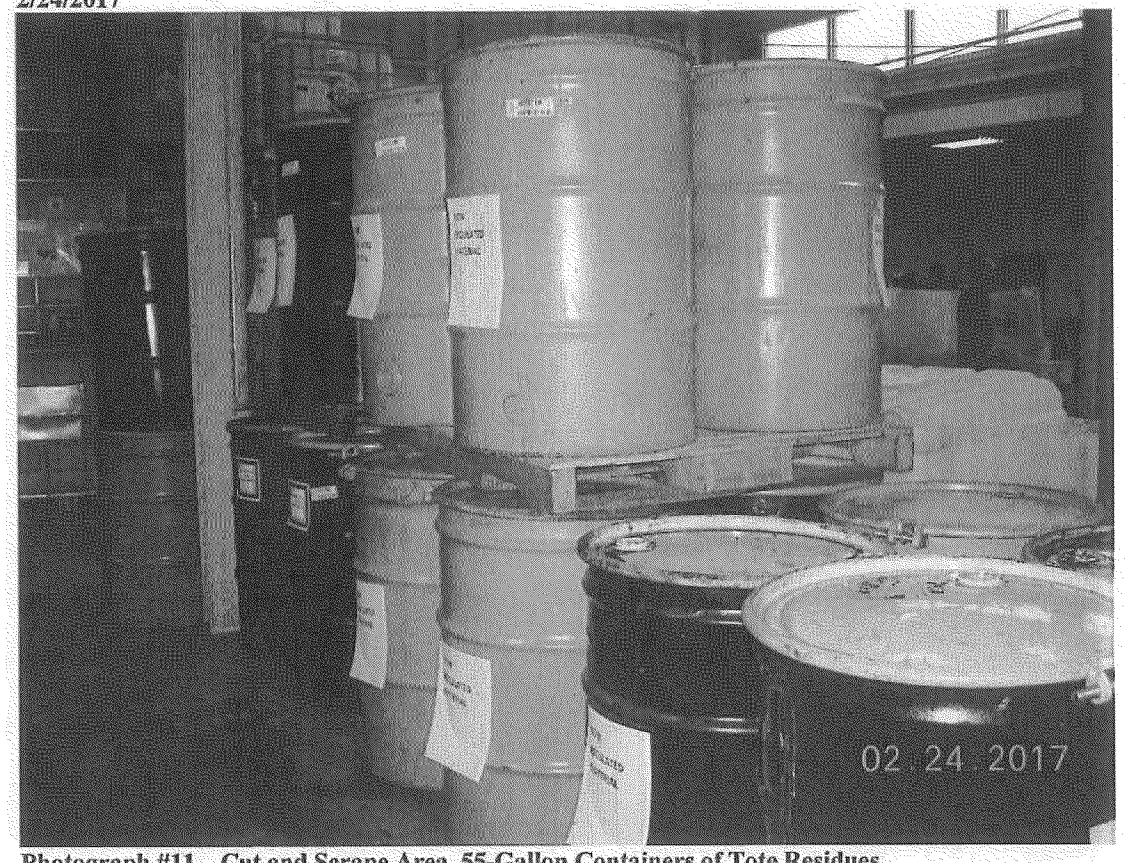


Photograph #9 – Cut and Scrape Area, Drain Table and 55-Gallon Container

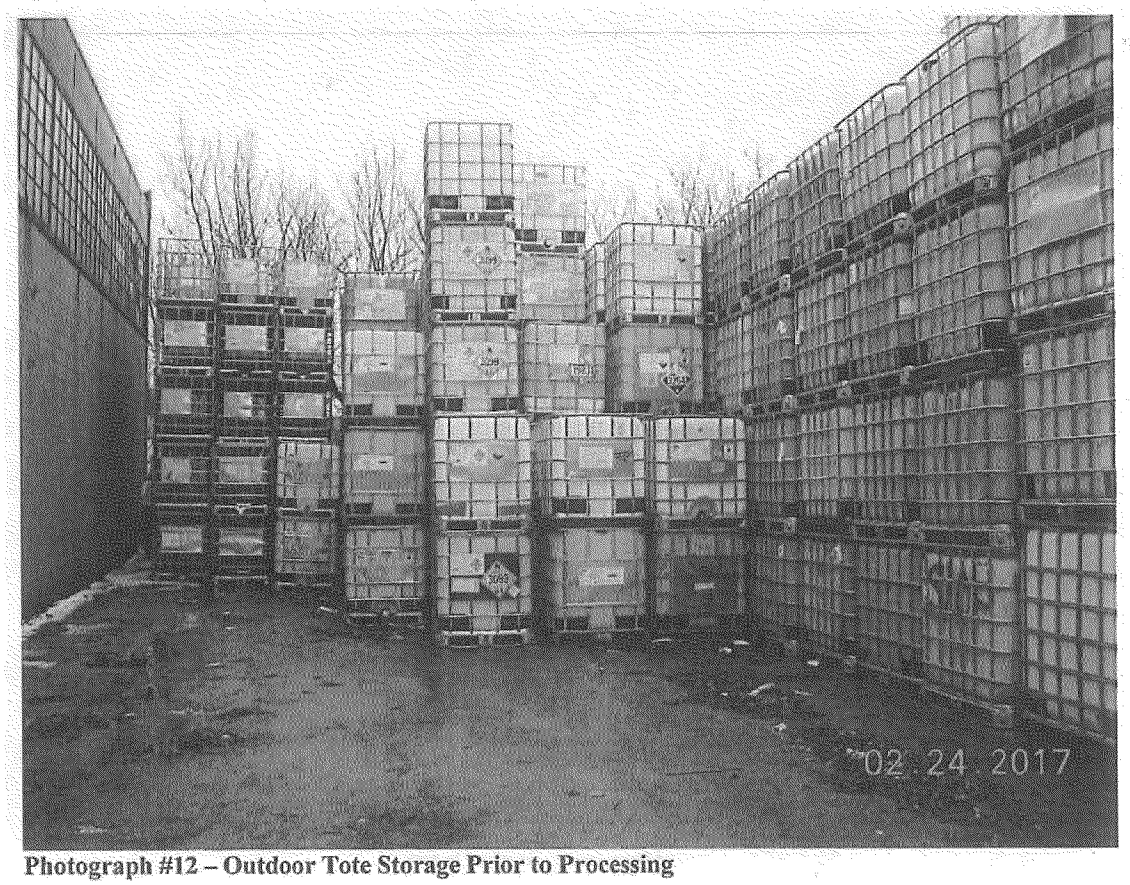


Photograph #10 – Cut and Scrape Area, Tote Saw

Mid America IBC
Milwaukee, Wisconsin
2/24/2017



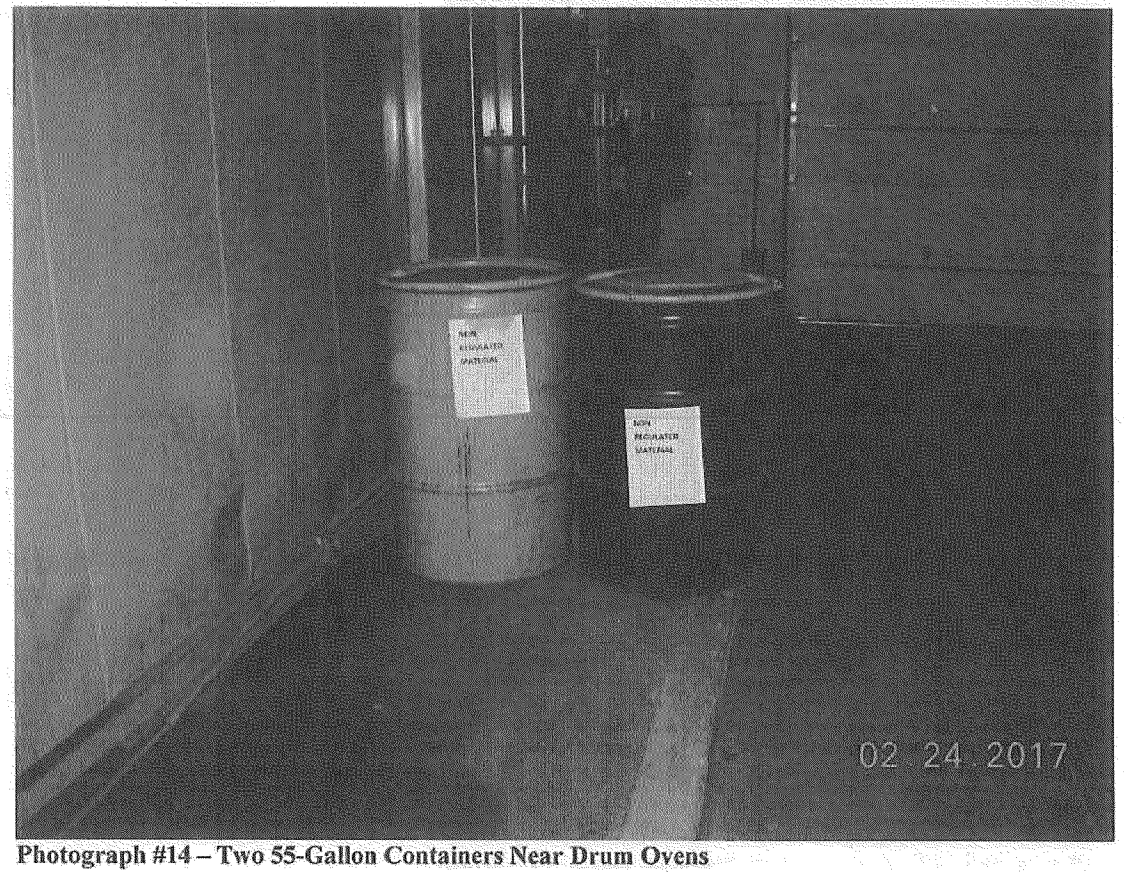
Photograph #11 – Cut and Scrape Area, 55-Gallon Containers of Tote Residues



Photograph #12 – Outdoor Tote Storage Prior to Processing

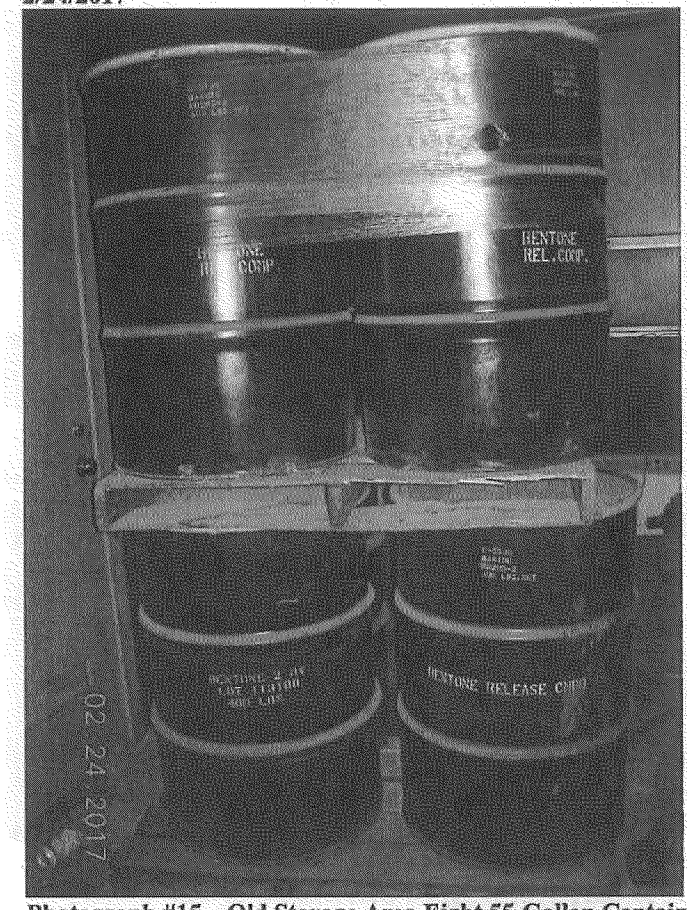
Mid America IBC
Milwaukee, Wisconsin
2/24/2017

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

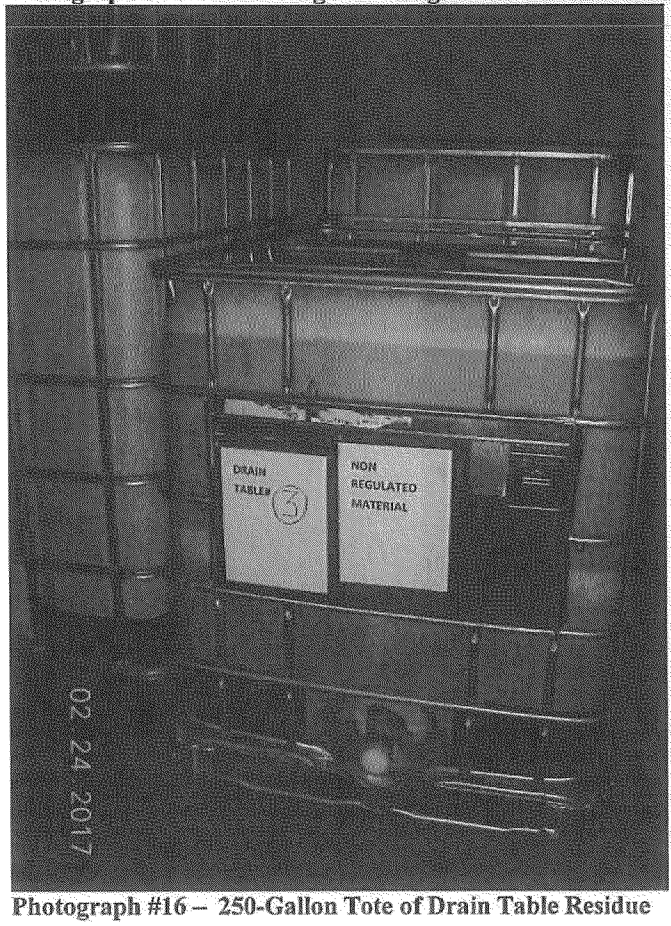


Photograph #14 – Two 55-Gallon Containers Near Drum Ovens

Mid America IBC
Milwaukee, Wisconsin
2/24/2017

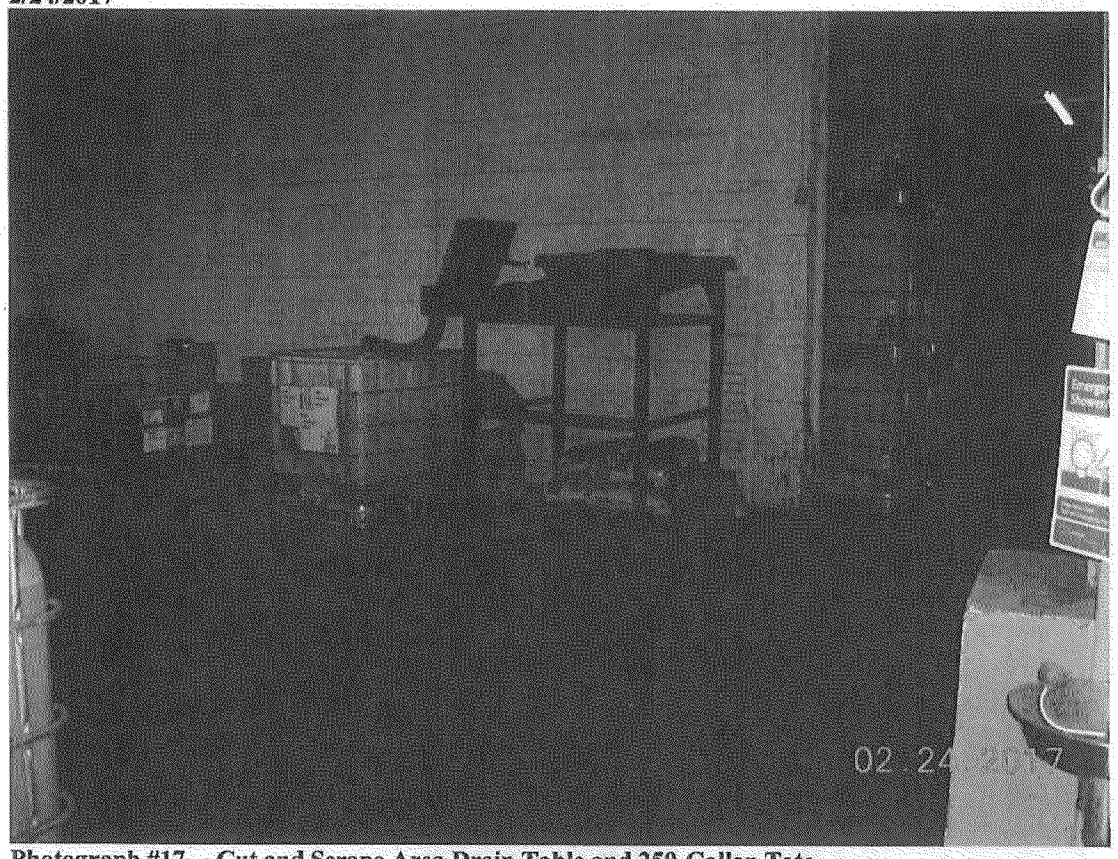


Photograph #15 – Old Storage Area Eight 55-Gallon Containers

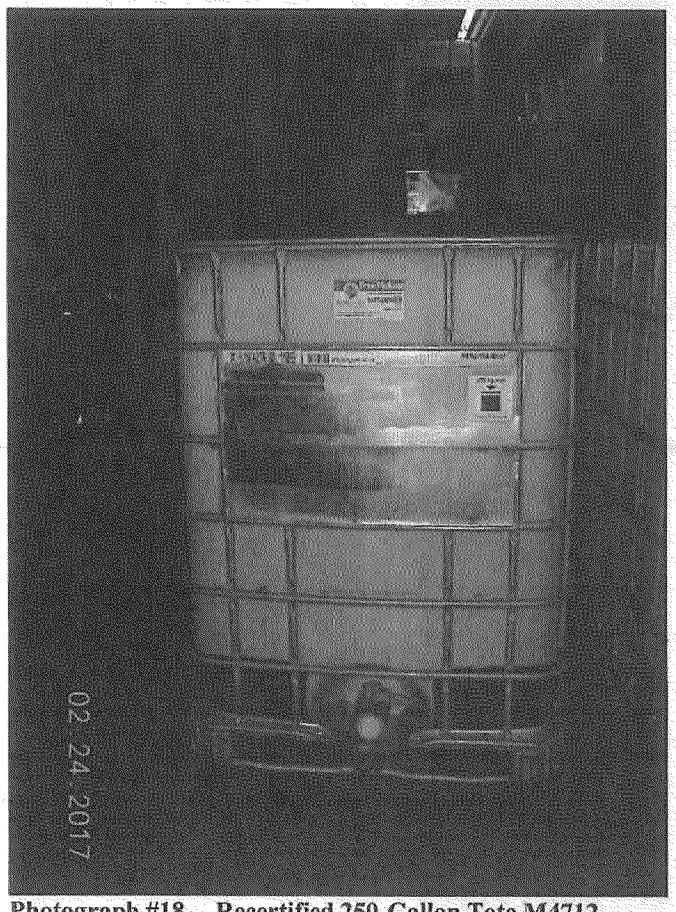


Photograph #16 – 250-Gallon Tote of Drain Table Residue

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

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

Compliance Evaluation Inspection Report

Date of Inspection:	February 28, 2017
Facility Name:	Mid-America Steel Drum
Facility Address:	3950 South Pennsylvania Avenue St. Francis, Wisconsin 53235
EPA RCRA ID Number:	WIR000131367
Generator Status:	Small Quantity Generator
Facility Contact:	Mark Furgason – Plant Manager
EPA Representatives:	Brenda Whitney - Environmental Engineer RCRA Branch Compliance Section 2 Land and Chemicals Division

Prepared By: Brenda Whitney – Environmental Engineer — 3/16/17 Date

Approved By: Julie Morris – Chief, Compliance Section 2 — 3/20/17 Date

Purpose of the Inspection

An unannounced Compliance Evaluation Inspection (CEI) at Mid-America Steel Drum located at 3950 South Pennsylvania Avenue in St. Francis, Wisconsin ("MASD-SF" or "Facility"), took place on February 28, 2017. This CEI was conducted in cooperation with the Wisconsin Department of Natural Resources (WDNR) and the Pipeline and Hazardous Materials Safety Administration (PHMSA). This joint effort was made in response to a whistle-blower complaint published in articles in the Milwaukee Journal Sentinel in February, 2017, and in response to letters of concern from Wisconsin politicians.

MASD-SF is listed as a small quantity generator in RCRAInfo. The CEI was an evaluation of MASD-SF's compliance with hazardous waste regulations codified at the authorized Wisconsin Administrative Code and the Code of Federal Regulations.

Participants

The following people were present for part or all of this inspection:

Name	Government Program	Representing
Mike Griffin	Air Program	WDNR
Paul Grittner	Remediation and Redevelopment Program	WDNR
Benjamin Benninghoff	Stormwater Program	WDNR
Cathy Baerwald	RCRA	WDNR
Bryan Hartsook	Wastewater Program	WDNR
Ted Turner	PHSMA	DOT
Tiffany Ziemer	PHSMA	DOT
Kathy Halbur	Superfund	EPA
James Entzminger	Superfund	EPA
Brenda Whitney	RCRA	EPA
Ian Boyle	N/A	CLCM
Mark Furgason	N/A	CLCM
Robert Janowski	N/A	CLCM
Steele Johns	N/A	Greif
Scott Bush	N/A	Greif
Mike Higgins	N/A	MASD
Linda Benfield	N/A	Foley and Lardner
Amanda Beggs	N/A	Foley and Lardner
Sarah Slack	N/A	Foley and Lardner

Introduction

The inspection team arrived at MASD-SF at 9:45am. The receptionist at the front desk contacted Facility personnel who met us in the lobby. I displayed my credentials, and we moved to an open training area above the offices where we could discuss the inspection. We waited for the site attorneys to arrive before beginning discussions. A sign-in sheet was completed and is included in Appendix C. After introductions and delineation of the inspection parameters including sampling, we were provided a tour of the Facility. Mr. Boyle noted that he would use his own containers to take simultaneous samples. Ms. Benfield stated that any photographs taken at the site would need to be evaluated to determine if they contained confidential business information (CBI). Ms. Benfield further stated that any other generic process information garnered throughout the rest of the inspection would not be considered CBI.

Site Description

The following information about MASD-SF is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text.

Facility Background Information:

- MASD has three facilities in southeast Wisconsin. They are operated by Container Life Cycle Management (CLCM), which operates a total of six facilities in Wisconsin, Tennessee, Indiana, and Arkansas, and is majority owned in a joint venture by Greif, Inc.
- CLCM has been operating the facility since 2013.
- Approximately 40 people are employed at this Facility.
- Total area under roof = 45,000ft^2.

Process Information:

- MASD-SF reconditions steel and plastic tight-head 55-gallon drums using a wash system.
- Drums are certified by the vendors to be RCRA empty.
- Dock operators are responsible for determining by "feel" if the containers are actually RCRA empty.
- The non-RCRA empty containers are segregated on the dock and are considered "heavies." MASD-SF will contact the vendor for pick-up. The vendor is charged $75 per heavy drum that is returned. According to Mr. Boyle, contracts for repeat offenders are canceled or not renewed. Mr. Boyle did not quantify the number of offences that demark a vendor as a repeat offender.
- The RCRA-empty containers are segregated twice. The first is to separate the steel from the plastic containers. The second is to separate drums with oily residue from those with chemical residue.
- The steel containers are transferred into the facility on two conveyors - one for the oily drums, and one for the chemical drums.
- At the top of the conveyors, the steel drums are flipped onto a spray nozzle and are injected with hot water. The water recirculates in four holding tanks ranked from dirtiest (first wash) to cleanest (final wash).
- The hot wash tanks are vented to a wet scrubber for pH adjustment only.
- The water used to rinse the oily steel drums is routed specifically into a hot water tank that has an oil-water separator. The skimmed oil is routed to a 7,000-gallon storage tank.
- The drums are then processed through an external rinse, which uses a surfactant and water from the second hot tank.
- Steel drums are inspected for rust. Rust is removed in a muriatic acid spray chamber. The drums are rinsed in that chamber with water from the first hot rinse tank. Sodium hydroxide is added to this tank to neutralize the influent acid.
- The exterior of the steel drums is shot blasted to remove paint and labels.
- The drums are then repainted before being sent for DOT-conformance inspection.
- Plastic drums are washed and inspected in the same fashion as steel drums, but do not have to undergo acid rust-removal, shot-blasting, or painting procedures.

Waste Generation and Management:

- Clean-out residuals from the hot-water rinse tanks are managed as non-hazardous waste. It was not determined during the inspection if a waste determination was made for each individual tank, which would have separate points of generation. This waste is sent to Badger Disposal.
- Filter cake from the wastewater treatment unit is managed as non-hazardous waste. This waste is sent to Badger Disposal.

- Wastewater is managed in an on-site wastewater treatment unit. Prior to discharge to the City POTW, the water passes through a carbon filter. The operators were not aware of the carbon ever having been changed out.
- Paint booth filters are managed as non-hazardous wastes.
- Paint lines are not flushed with solvent. The paints are compatible and do not require flushing between colors. Waste paint is reused in-house as "bottom paint."
- 100% acetone is used on rags which are used to clean the paint equipment. Used rags are managed as non-hazardous waste.
- Non RCRA-empty heavies are not managed as waste at this site. According to a DOT inspector, DOT would not consider the material in the drums to be waste if the container has not been cleaned and purged at the site. The material would be considered "residue" and therefore, the drums would not need to be shipped on a hazardous waste manifest, even if the material in the containers is deemed hazardous by the vendor to whom it is returned.
- Oil removed from the oil-water separator is stored in a 7,000-gallon tank near the wastewater treatment unit. The oil is shipped to Future Environmental as "Used Oil."
- Containers that are not fit for reconditioning are squashed (steel) or pulverized (plastic) for recycling.

Site Tour

The following observations were made during the site tour:

Mike Griffin, of WDNR, took readings with a Multi-Rae monitor that was supplied by Kathy Halbur of EPA, Superfund. Cathy Baerwald and Bryan Hartsook of WNDR along with Kathy Halbur took samples of opportunity throughout the inspection. These samples were sent to the WDNR lab for analysis. A copy of the chain of custody for the samples is included in Appendix C.

The tour began at the truck dock. I observed the operators as they made their determinations by feel of whether the drums were RCRA-empty. Plastic drums are stacked two high awaiting processing. Two drums were fuming at the time of the inspections. The drums were pulled from the stacks. It was determined that the bung rings were not tightly fastened and the residual acid in the drum was reacting to moisture in the air. The steel drums are rolled over to the conveyors to be transferred inside the building for washing. The plastic drums are reloaded into trucks to be moved to another side of the building for their own wash system.

Heavies are segregated off to the side of the dock. Five heavy drums were in storage at the time of the inspection. The drums maintained their original labels and had not been opened or modified by MASD-SF. The drums were not marked with dates of receipt. Tractor trailers at the dock were opened so that we could see their contents. One of the trailers held bags of metasilicate pentahydrate which is a drum conditioner formerly used at the site for rust-preventions. Mr. Furgason stated that this material was still product. Another trailer of "non-cleanable" plastic drums was to be shredded. Mr. Furgason did not elaborate on the definition of "non-cleanable."

The inspection proceeded to the top of the washing process for steel drums. Here we observed how the drums are opened and flipped onto the washing nozzle. I did not observe any discernable liquid emerging from the drums as they were overturned. Mr. Furgason explained that the furthest tank from the beginning of the wash conveyor was the first wash tank which gets most of the residue out of the container. The next tank in line is the second wash tank, the third tank contains the oil-water separator, and the fourth tank is the cleanest, final rinse tank.

A sample was taken from the fourth tank and another sample was taken from the first tank. The water in the tanks is kept at approximately 200°F. The Multi-RAE meter picked up negligible VOC readings in the fourth tank and higher readings from the first tank. These tanks are vented to the acid scrubber.

The next step in the process is the external wash system which uses water from the second hot water tank and a surfactant. Buckets were set up to capture gray opaque drippings from the unit. Mr. Furgason stated that the drippings are not hazardous.

The drums proceeded to rust inspection. The rusty drums are processed through the muriatic acid wash. The acid is rinsed out of the drums with water from the first hot water tank. I observed some drums that had been removed from the acid wash operation that were fuming out of the open bung rings. These containers were contaminated with VOCs as indicated by odors and by readings on the Multi-RAE. Also, acid in contact with moisture, as with the drums observed on the dock, will fume. The drums were otherwise empty.

The cleaned drums are placed back onto the conveyor for blasting. One drum of spent dust was attached to the unit. Mr. Furgason stated that this waste is non-hazardous. The blasted drums proceed to paint. I observed the paint booth which is under draft to the atmosphere. According to Mike Higgins, the paints used are water-based, but also contain a low percentage of hazardous air pollutants (HAPs). One drum of "waste paint" in the area was to be used for bottom paint. One container of rags was also in the area. The operator stated that only 100% acetone is used for cleaning. The paint filters and rags are managed as non-hazardous waste.

We next observed the air scrubber unit. Some of the piping/ductwork in this area was corroded and, according to Mr. Furgason, was going to be replaced with acid resistant materials. A sample was taken from an in-ground drain that was in the vicinity of the scrubber.

The wastewater treatment unit was not running at the time of the inspection. However, one 55-gallon drum contained filter cake from the unit. A sample of the filter cake was taken. Also in this area, were eleven 55-gallon steel drums marked as "Non-Hazardous Waste." According to Mr. Furgason, these drums contained the sediment from the hot water rinse tanks. A sample was taken from one of these containers. The 7,000-gallon tank for oil was in this area. The tank was labeled as "Used Oil."

The final area observed at this plant was the plastic drum reconditioning line. The drums at this line are handled manually. The line is soon to be replaced with a new unit that is currently under construction. The line utilizes only three wash tanks because there is no oil-water separator tank needed. A strong odor of ammonia was present in this area. A sample was taken from the first

hot water rinse tank. I did not observe any discernable discharge from the containers as they were overturned onto the spray nozzle.

The tour concluded at this point and we returned to the conference room for close-out. When we returned to that area, Mike Griffin of WDNR went up to the roof of the facility and observed the scrubber stack, from which a flow of liquid was discharging into a pipe that eventually led to a storm drain. The reason the system was set up to leak in this way was not made clear during the inspection.

Records and Emergency Preparedness Review

I did not review emergency preparedness procedures for the facility. A question did arise during the CEI regarding the Facility procedures for preventing possible emergencies that may occur due to mixing of incompatible wastes. The concept of RCRA empty containers was discussed in this context. The Facility does not have any written procedures that are followed to ensure containers are RCRA empty before they are dumped in the washing system. As mentioned above, the operators use a "feel" of the container to determine RCRA-empty status.

Records were not available for review during the inspection. A list of records requested by each media during the CEI was provided to the Facility representatives. The list is included in Attachment C.

Closing Conference

During the closing conference with the MASD-SF representatives, each media discussed any observations made during the CEI. We provided the representative with the list of documents that were being requested. For my part, I informed them that I would be generating a report that included a letter, narrative discussion of the CEI and attendant photographs and checklists. Any response needed from MASD-SF according to the letter would be expected within 30 days.

The following items were discussed with MASD-SF personnel at the close of the inspection.

- Photographs were to be sent to Linda Benfield for CBI determinations. Other information discussed and collected throughout the inspection was not claimed as CBI;
- Expectations for waste determination records;
- The definition of used oil;
- Procedures for determining RCRA empty; and,
- Procedures for storing and returning heavy containers.

Appendices

Appendix A: Photograph Log
Appendix B: Small Quantity Generator checklist
Appendix C: Documents provided to the Facility during the CEI

Appendix A

Photograph Log

Inspection Date:
February 28, 2017

Facility Name and ID Number:
Mid-America Steel Drum
EPA ID: WIR000131367

Inspector and Photographer:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

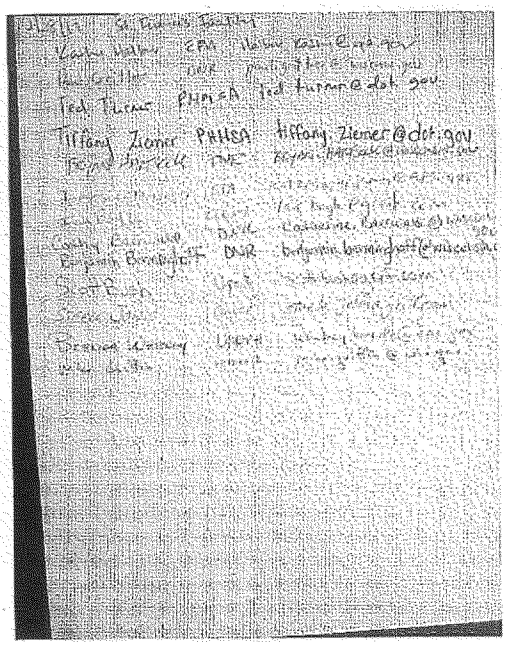
Camera Used:
Olympus Stylus 600
Serial Number: A47525904

3/15/2017

Photograph 1

Taken at 11:45 a.m. CST

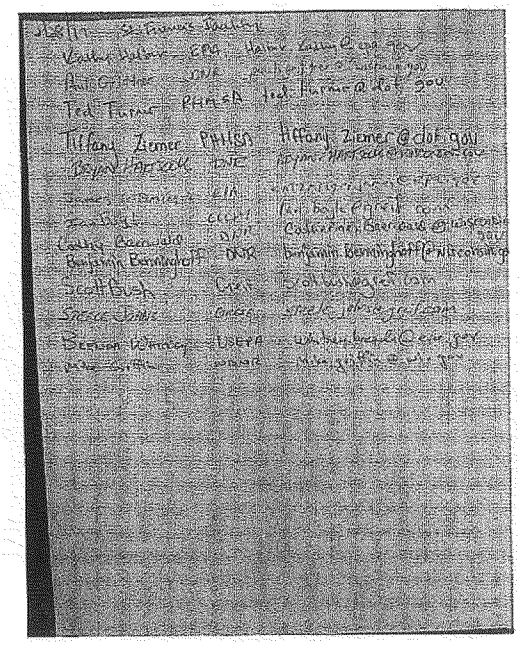
Initial photograph of sign-in sheet for the inspection.



Photograph 2

Taken at 11:45 a.m. CST

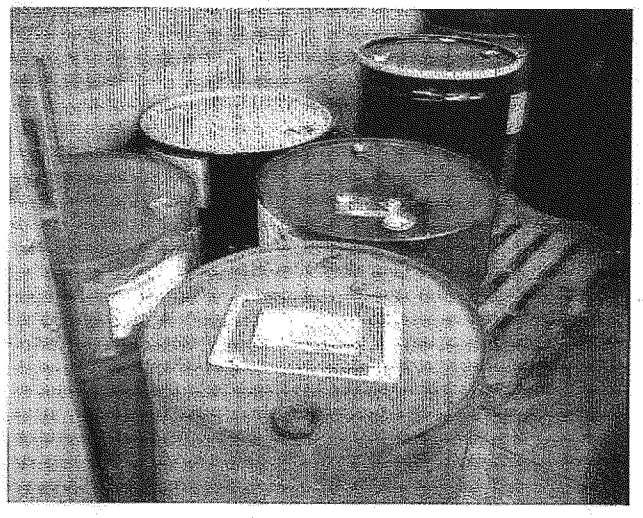
Duplicate of Photograph 1.



Photograph 3

Taken at 12:28 p.m. CST

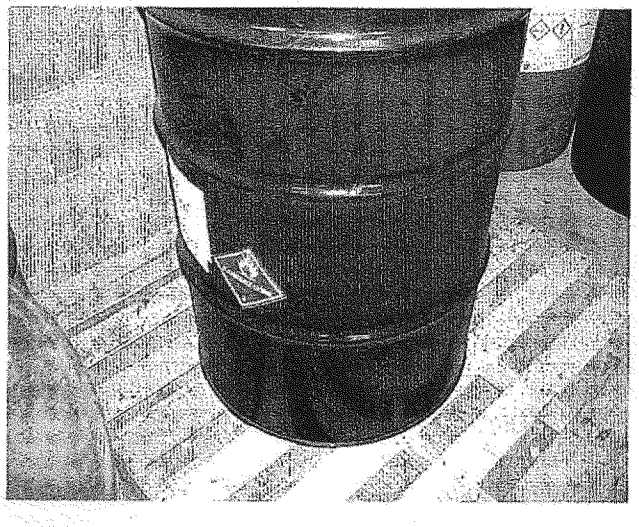
Five 55-gallon drums in various conditions were set aside on the truck dock as "Heavies." These containers were not marked with individual labels indicating that they were to be returned to the vendor. However, they were in an area that was demarked for Heavies.



Photograph 4

Taken at 12:29 p.m. CST

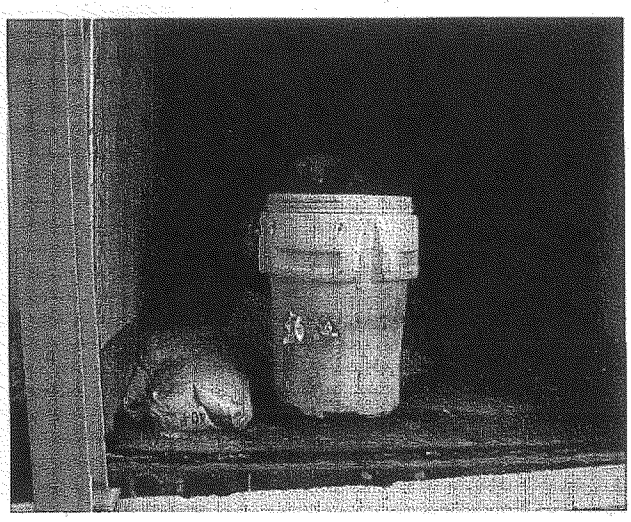
One of the Heavy containers had a "Flammable Liquid" label. This particular container had a seal around the bung clasp indicating that it was a product that had never been used.



Photograph 5

Taken at 12:32 p.m. CST

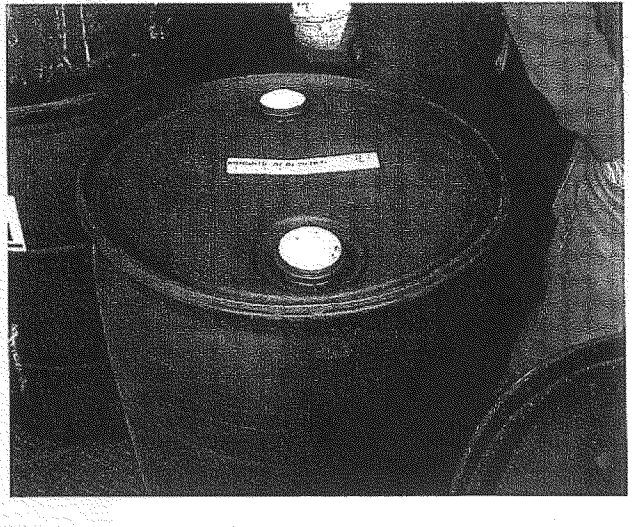
A trailer backed up to the dock contained a pallet of Metasilicate Pentahydrate. According to Mr. Furgason, this material is used as a rust inhibiting drum conditioner.



Photograph 6

Taken at 12:38 p.m. CST

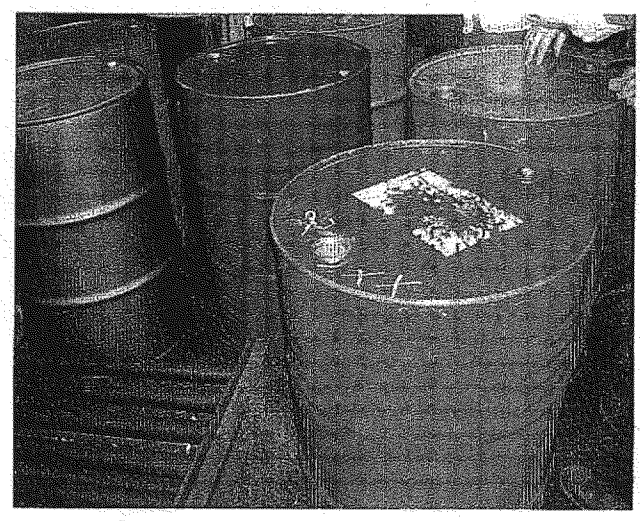
This 55-gallon drum was staged on the truck dock. Visible fumes were emanating from the bung cap. The drum had contained acid. According to Mr. Furgason, the bung cap had not been fastened tightly, and most likely some acid on the cap was reacting to moisture in the air.



Photograph 7

Taken at 1:20 p.m. CST

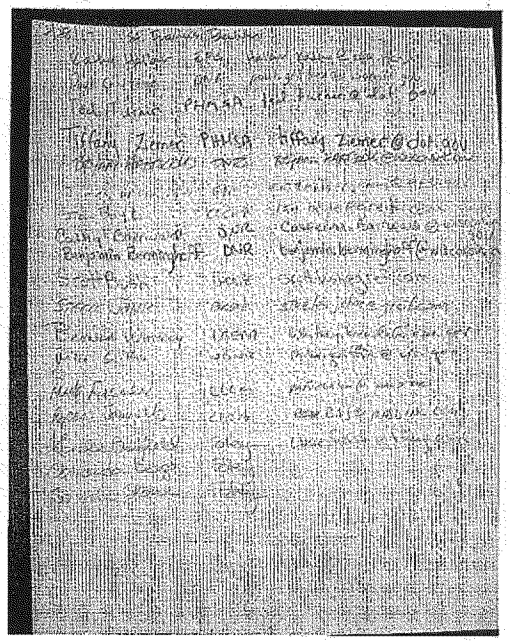
Each of the drums in this photograph had been processed through an acid wash and hot water rinse to remove rust. The two red 55-gallon drums in the forefront of this photograph were fuming. The white fumes can be seen in the bung hole of the foremost drum. These containers smelled strongly of organics though they were empty.



Photograph 8

Taken at 3:35 p.m. CST

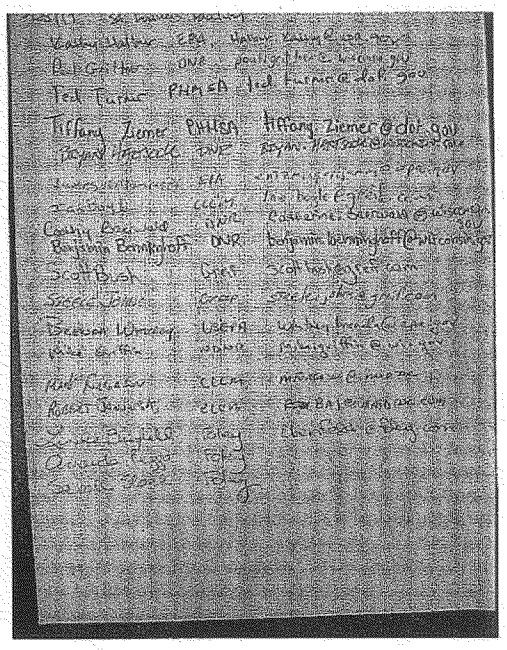
This photograph is of the complete sign-in sheet as it appeared at the end of the inspection.



Photograph 9

Taken at 3:35 p.m. CST

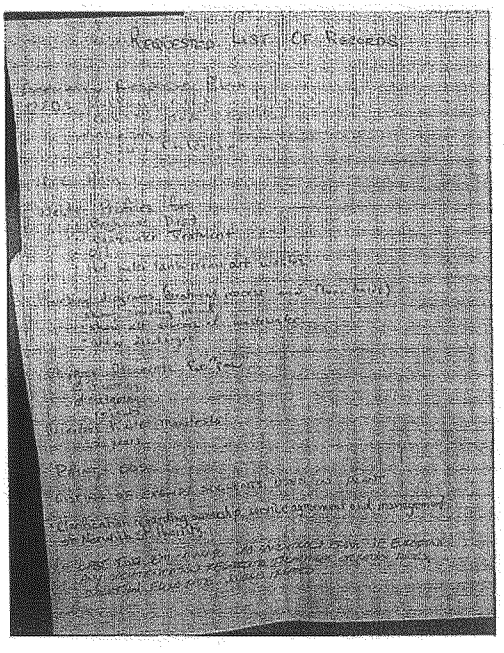
Duplicate of Photograph 8.



Photograph 10

Taken at 4:16 p.m. CST

This photograph is of the "Requested List of Records" that was provided to Facility counsel at the close-out meeting.

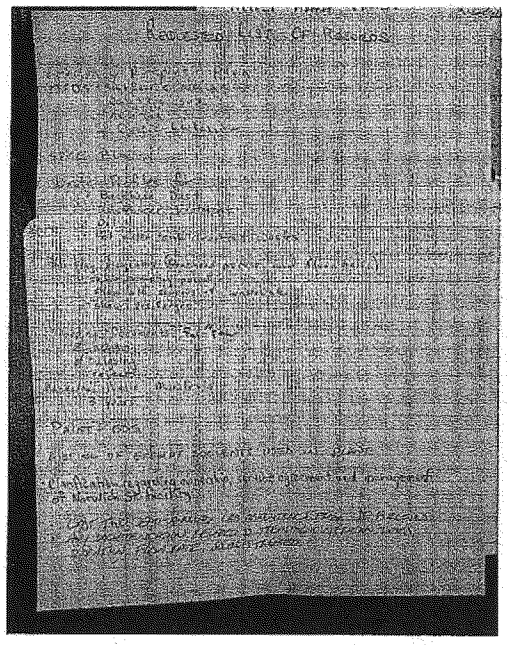


3/15/2017

Photograph 11

Taken at 4:17 p.m. CST

Duplicate of Photograph 10.



Appendix B

Checklists

Inspection Date:
February 28, 2017

Facility Name and ID Number:
Mid-America Steel Drum
EPA ID: WIR000131367

Inspector:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

Mid America Steel Drum
St. Francis, WI WIR000131367

SMALL QUANTITY GENERATOR INSPECTION

Revision: 08/04/2015
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate between 100 kg (220 lbs) and 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month and less than 1 kg of acute hazardous waste in a calendar month , evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated (NR 662.011).	Y	662.190(2)
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)).	UN	662.190(2)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1).	UN	662.190(2)
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility. Documents have been requested.	UN	662.193(1)(b)
E. Generator submitted a notification form and obtained an EPA ID# (NR 662.012). Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.190(2)

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator sends waste off-site to be reclaimed under a contractual agreement. If NO, go to Question 2.E.	NO	
B. Type of waste and frequency of shipments are specified in the contractual agreement.	N/A	662.191(1)(a)
C. Vehicle used to transport the waste to the recycler and back to the generator is owned and operated by the reclaimer.	N/A	662.191(1)(b)
D. Copy of the reclamation agreement is maintained for at least 3 years from the date the agreement is terminated or expires.	N/A	662.191(2)
E. Generator sends hazardous waste off-site that is not reclaimed under a contractual agreement. If NO, go to Question 2.K.	Y	
F. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1). Documents have been requested	UN	662.190(2)(a)
G. The facility designated on the manifest is permitted or licensed to accept the waste (NR662.020(2)).	UN	662.190(2)(a)
H. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).	UN	662.190(2)(a)
I. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262 (NR 662.020(1)).	UN	662.190(2)(a)
J. If the generator received a shipment back as a rejected load, the returned waste has been accumulated in compliance with the container or tank standards for less than 180 days.	N/A	662.192(5)
K. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.192(5)

Revision: 08/04/2015
WASTE & MATERIALS
MANAGEMENT PROGRAM

SMALL QUANTITY GENERATOR INSPECTION

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

L. Copy of the manifest is signed by the generator and retained until the signed copy from the designated facility is received.	UN	662.193(1)(a)
M. Copy of each manifest is kept for at least three years from the date of shipment.	UN	662.193(1)(a)
N. Hazardous waste is packaged according to applicable DOT requirements before transport (NR 662.030). NONE OBSERVED	N/A	662.190.(2)
O. Hazardous waste is labeled according to applicable DOT requirements before transport (NR 662.031).	N/A	662.190(2)
P. Hazardous waste is marked according to applicable DOT requirements before transport (NR 662.032(1)).	N/A	662.190(2)
Q. Containers of 119 gallons and less are marked with the "Hazardous Waste - Federal law prohibit improper disposal" label before transport (NR 662.032(2)).	N/A	662.190(2)
R. Placards are offered to the initial transporter (NR 662.033).	Y	662.190(2)

Section 3: Land Disposal Restrictions

Documents have been requested

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	UN	668.07(1)
B. A copy of the LDR notification and certification for solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under ss. NR 661.02 to 661.06, or exempted from ch. 291, Stats., and chs. NR 660 to 673, subsequent to the point of generation.	N/A	668.07(1)(h)
C. Generator complies with the prohibition against dilution of wastes.	UN TBD	668.03
D. A one-time written notice is sent to each treatment, storage or disposal facility with the initial waste shipment.	UN	668.07(1)
E. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	UN	668.07(1)
F. If the waste MEETS treatment standards, the LDR notice certifies the wastes may be land disposed without further treatment.	N/A	668.07(1)
G. If the waste EXCEEDS treatment standards, the LDR notice notifies of appropriate treatment and applicable prohibitions.	UN	668.07(1)
H. Copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	UN	668.07(1)(h)
I. Generator with a contractual agreement complies with BOTH of the following: 1. The notification and certification requirements for the initial shipment of the waste subject to the agreement. 2. Retains a copy of the notification and certification with the tolling agreement for at least 3 years after the agreement is terminated or expires.	N/A	668.07(1)(j)

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not ApplicableND: Inspected, Not Determined NI: Not Inspected
Noncode ? : Y: Yes N: No UN: Unknown

Notes : *: Dept. approved alternate may apply No 'box' is an open ended question

SMALL QUANTITY GENERATOR INSPECTION

Revision: 08/04/2015
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 3: Land Disposal Restrictions

J. Underlying hazardous constituents have been identified for characteristic wastes.	UN	668.09(1)
K. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste code. 2. The treatment standards for all applicable listed and characteristic waste codes.	UN	668.09(2)
L. If waste is treated in containers or tanks, the generator meets with BOTH of the following (NR 668.07(1)(e)): 1. Developed a waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	NA	662.192(1)(d)

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the previous calendar year have been submitted to the Department by March 1 of the following year.	Y	662.193(3)
B. Copy of each annual report is kept for at least 3 years from the due date of the report.	UN	662.193(1)(c)
C. If the signed manifest copy is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department.	UN	662.193(2)

Section 5: Preparedness and Prevention

A. Generator has ALL of the following equipment, unless the equipment is not necessary for the types of wastes handled (665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	NI	662.192(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (665.0033).	NI	662.192(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (665.0034).	NI	662.192(1)(d)
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037(1)): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the potential resulting injuries or illnesses.	NI	662.192(1)(d)

SMALL QUANTITY GENERATOR INSPECTION

Revision: 08/04/2015
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 5: Preparedness and Prevention

E. Aisle space is provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	N	662.192(1)(d)

"RCRA - Empty Drums Are Stacked W/out Aisle Space

Section 6: Emergency Procedures & Personnel Training Requirements

A. A person has been identified as an emergency coordinator who is responsible for coordinating all emergency response measures and is on the premises or able to reach the site within a short period of time.	Y	662.192(1)(e)1
B. ALL of the following information is posted next to the telephone: 1. Name and telephone number of the emergency coordinator. 2. Location of fire extinguishers, spill control material and, if present, fire alarm. 3. Telephone number of the fire department unless the generator has a direct alarm.	NI	662.192(1)(e)2
C. In the event of an emergency, the emergency coordinator takes the following actions: 1. In the event of a release, telephone the division of emergency management (800-943-0003) and comply with NR 706. 2. In the event of a fire, call the fire department or attempt to extinguish the fire, if appropriate. 3. In the event of a spill, contain the flow of hazardous waste to the extent possible and clean up the hazardous waste and contaminated materials or soil. 4. If there is a release that could threaten human health outside the facility or if a spill reaches surface water, immediately notify the national response center (800-424-8802).	NI	662.192(1)(e)4
D. All employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal operations and emergencies.	NI	662.192(1)(e)3

Section 7: Container Accumulation

A. Generator accumulates hazardous waste in containers. If NO, go to Section 8. None Observed	No	
B. The accumulation start date is clearly marked and visible for inspection on each container.	NA	662.192(1)(d)1
C. All containers are clearly marked with the words "Hazardous Waste".	NA	662.192(1)(d)2
D. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).	NA	662.192(1)(b)
E. Containers are made or lined with materials compatible with the waste (NR 665.0172).	NA	662.192(1)(b)
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	NA	662.192(1)(b)
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	NA	662.192(1)(b)
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	NA	662.192(1)(b)
I. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	NA	662.192(1)(b)

SMALL QUANTITY GENERATOR INSPECTION

Revision: 08/04/2015
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 7: Container Accumulation

J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	NA	662.192(1)(b)
K. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	NA	662.192(1)(b)

Section 8: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 9. None Observed	NA	
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	N/A	662.192(4)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	N/A	662.192(4)(a)
D. Containers are always kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N/A	662.192(4)(a)1
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	N/A	662.192(4)(a)1
F. Containers are marked "Hazardous Waste" or with other words that identify the contents.	N/A	662.192(4)(a)2
G. If the container is leaking or in poor condition, contents are transferred to another container in good condition (NR 665.0171).	N/A	662.192(4)(a)1
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	N/A	662.192(4)(b)
I. Generator complies with the 180 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	N/A	662.192(4)(b)

Section 9: Used Oil

A. Used oil is managed on-site. If NO, go to Section 10. The oil collected at this site is solid waste.	No	
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	NA	679.10(2)(a)2
C. Used oil containers and tanks are in good condition and not leaking.	NA	679.22(2)
D. Used oil containers and tanks are marked "used oil".	NA	679.22(3)(a)

SMALL QUANTITY GENERATOR INSPECTION

Revision: 06/04/2015
WASTE & MATERIALS MANAGEMENT PROGRAM

Section 9: Used Oil

E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.	N/A	679.24
F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.	N/A	679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N/A	679.23
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N/A	679.11

Section 10: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 11. NONE OBSERVED Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.	N/A	
B. Universal waste has not been disposed, treated or diluted. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	N/A	673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	N/A	673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	N/A	673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	N/A	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler.	N/A	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.15(2)
H. Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.	N/A	673.15(3)
I. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	UN	673.16
J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.	N/A	673.17

SMALL QUANTITY GENERATOR INSPECTION

Revision: 08/04/2015
WASTE & MATERIALS MANAGEMENT PROGRAM

Section 10: Universal Waste

K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section.	UN	673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	UN	673.18(3)
M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.	N	

Section 11: Waste Minimization Certification

A. Small quantity generator has made a good faith effort to minimize the amount of waste generated (NR 662.027(2)).	UN	662.190(2)(a)

Section 12: Generator Status Evaluation

A. Between 220 lbs (100 kg) and 2,205 lbs (1,000 kg) of waste is generated in any month. NONE OBSERVED	UN	662.190(1)
B. Waste is accumulated for 180 days or less.	UN	662.192(1)
C. Waste is accumulated for 270 days or less if the generator must ship 200 miles or more.	N/A	662.192(2)
D. Less than 13,230 lbs (6,000 kg) of waste is accumulated.	Y	662.192(1)(a)

E. Describe any other activities the generator is conducting at the facility.

* Storage of oil in 7,000-gallon tank.
An analysis of the oil has been requested.

Appendix C

Documents generated during the Inspection:

- Sign-in Sheet
- Record Request Sheet
- Chain of Custody for Samples

Inspection Date:
February 28, 2017

Facility Name and ID Number:
Mid-America Steel Drum
EPA ID Number: WIR000131367

Inspector:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

8/28/17 St. Frances Facility

Kathy Halber, EPA, Halber.Kathy@epa.gov
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Linda Benfield Foley Lbenfield@foley.com
Amanda Beggs Foley
Sarah Slack Foley

REQUESTED LIST OF RECORDS

Emergency Response Plan
MSDS - sulfuric acid
- caustic soda
- Acetone
- Ferric Chloride

SPCC Plan

Waste Profiles for
- Baghouse Dust
- Wastewater Treatment
- Oil
- Hot water tank clean-out wastes.

Plumbing diagrams (treatment process and floor drains)
- show sampling point
- show all sources of wastewater
- show discharges

Shipping Documents for "raw"
- incoming
- outgoing
- rejects

Hazardous Waste Manifests
- 3 years

PAINT - SDS

LISTING OF EXEMPT SOLVENTS USED IN PLANT

- Clarification regarding ownership, service agreement and management of Norwich St. facility

- LAST TWO SEMI-ANNUAL LAB ANALYTICALS FROM JF EUROFINS
- ANY DOCUMENTATION RELATED TO TREATMENT OPERATION DATES, DURATION, FLOW RATE, SOURCES TREATED

State of Wisconsin
Department of Natural Resources

Chain of Custody Record

Form 4100-145 (R 2/01)

Sample Collector(s)	Title / Work Station	Telephone Number (include area code)
KATHY HALBUR, BRYAN HARTSOUK	EPA ON-SCENE COORD. / WASTEWATER SUPERVISOR	(414) 263-8512
Property Owner	**Property Address**	**Telephone Number (include area code)**
MED-AMERICA STEEL DRUM	3950 S PENNSYLVANIA AVE ST FRANCIS, WI	

Split Samples: Offered? ☑ Yes ☐ No
Accepted? ☑ Yes ☐ No Accepted By (Signature): → OPERATOR TOOK OWN SAMPLES

Field ID No.	Date	Time	No. of Containers	Station Location Sample Description	Lab ID Number	Lab Use Only: Cracked / Broken	Improperly Sealed	Good Condition	Other Comments
001	2/28	11:33 Am	1	TANK NO. 1 STEEL DRUM FIRST WASH SOURCE WATER HEATED					
002	2/28	11:42 AM	1	TANK NO. 4 STEEL DRUM FIRST WASH SOURCE WATER, HEATED, OLDEST					
003	2/28	12:30 pm	1	FLOOR DRAIN SUMP ~~WET SCRUBBER DISCHARGE COMBINED w/ FLOOR~~					
004	2/28	12:50 pm	1	LIQUID WASTE FROM STEEL DRUM LABELED NON-HAZARDOUS WASTE, ADJACENT TO PLANT					
005	2/28	12:55 Pm	1	DIATOMACEOUS EARTH SOLID WASTE END OF TREATMENT PLANT					
006	2/28	1:20 pm	1	FIRST WASH TANK ON POLY DRUM LINE HEATED					

I hereby certify that I received, properly handled, and disposed of these samples as noted below:

Relinquished By (Signature)	Date / Time	Received By (Signature)	Date / Time
[signature]	2/28 2:05	[signature]	2/28/17 1405
Relinquished By (Signature)	Date / Time	Received By (Signature)	Date / Time
Relinquished By (Signature)	Date / Time	Received for Laboratory By (Signature)	Date / Time

Disposition of Unused Portion Sample:

☐ Dispose
☐ Return
☑ Retain for _____ Days
☐ Other _____

EPA-R5-2018-002961_0000707

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

Compliance Evaluation Inspection Report

Date of Inspection:	March 2, 2017
Facility Name:	Mid-America Steel Drum
Facility Address:	8570 South Chicago Road Oak Creek, Wisconsin 53154
EPA RCRA ID Number:	WID045953189
Generator Status:	Small Quantity Generator
Facility Contact:	Michael Higgins – General Manager
EPA Representatives:	Brenda Whitney - Environmental Engineer RCRA Branch Compliance Section 2 Land and Chemicals Division
Prepared By:	Brenda Whitney – Environmental Engineer — Date: 3-23-17
Approved By:	Julie Morris – Chief, Compliance Section 2 — Date: 3/27/17

Purpose of the Inspection

An unannounced Compliance Evaluation Inspection (CEI) at Mid-America Steel Drum located at 8570 South Chicago Road in Oak Creek, Wisconsin ("MASD-OC" or "Facility"), took place on March 2, 2017. This CEI was conducted in cooperation with the Wisconsin Department of Natural Resources (WDNR) and the Pipeline and Hazardous Materials Safety Administration (PHMSA). This joint effort was made in response to a whistle-blower complaint published in articles in the Milwaukee Journal Sentinel in February, 2017, and in response to letters of concern from Wisconsin State Representatives.

MASD-OC is listed as a small quantity generator in RCRAInfo. The CEI was an evaluation of MASD-OC's compliance with hazardous waste regulations codified at the authorized Wisconsin Administrative Code and the Code of Federal Regulations.

Participants

The following people were present for part or all of this inspection:

Name	Government Program	Representing
Mike Griffin	Air Program	WDNR
Eric Amadi	Remediation and Redevelopment Program	WDNR
Curt Nickels	Stormwater Program	WDNR
Cathy Baerwald	RCRA	WDNR
Pete Wood	Wastewater Program	WDNR
Ted Turner	PHSMA	DOT
Tiffany Ziemer	PHSMA	DOT
Kathy Halbur	Superfund	EPA
James Entzminger	Superfund	EPA
Brenda Whitney	RCRA	EPA
Ian Boyle	N/A	CLCM
Mike Higgins	N/A	MASD
Kevin Meyer	N/A	MASD
Steele Johns	N/A	Greif
Scott Bush	N/A	Greif
Linda Benfield	N/A	Foley and Lardner
Sarah Slack	N/A	Foley and Lardner

Introduction

The inspection team arrived at MASD-OC at 9:00am. The receptionist at the front desk contacted Facility personnel who met us in the lobby. Many of these individuals were present at the MASD-St. Francis facility CEI two days prior. The Facility attorneys arrived at the site at the same time as the inspection team. I displayed my credentials, and we congregated in a large meeting room where we could discuss the inspection. A sign-in sheet was completed and is included in Appendix C. As we had done on Tuesday at St. Francis, we introduced ourselves and delineated the purpose of the inspection. We informed the Facility representatives that we were prepared to take samples of opportunity. Mr. Boyle noted that he would bring along his own sample jars in the event samples were taken. Ms. Benfield stated that any photographs taken at the site would need to be evaluated to determine if they contained confidential business information (CBI). Photographs that are not considered CBI are included in Appendix A. Photographs considered CBI are omitted from the public version of this report. The file name of the omitted photograph, however, is included in Appendix A with an indication that the photo does not appear due to CBI claims. Ms. Benfield further stated that any other generic process information garnered throughout the rest of the inspection would not be considered CBI.

Site Description

The following information about MASD-OC is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text.

Facility Background Information:

- MASD has three facilities in southeast Wisconsin. They are operated by Container Life Cycle Management (CLCM), which operates a total of six facilities in Wisconsin, Tennessee, Indiana, and Arkansas, and is majority owned in a joint venture by Greif, Inc.
- CLCM has been operating the facility since 2013.
- Approximately 55 people are employed at this Facility.
- Total area under roof was unknown at the time of the inspection.

Process Information:

- MASD-OC reconditions and remanufactures steel tight-head and open-head drums using a furnace to burn out residue.
- Incoming drums are certified by the vendors to be RCRA empty.
- Dock operators are responsible for determining by "feel" if the containers are actually RCRA empty.
- The non-RCRA empty containers are segregated on the dock and are considered "heavies." MASD-OC will contact the vendor for pick-up. The vendor is charged $75 per heavy drum that is returned. According to Mr. Boyle, contracts for repeat offenders are canceled or not renewed. Mr. Boyle did not quantify the number of offences that demark a vendor as a repeat offender.
- The RCRA-empty containers are segregated between the open-head and tight-head drums. Open-head drums can be sent directly to the dock by the furnace. Tight-head drums are processed through a "cutter" that cuts off the lid of the container like a can-opener. The sharp edge of the drum is either curled over or is left straight and sharp depending on the end use of the container. According to Mr. Higgins, the lids are typically placed back on top of the drum to mitigate emissions until the container can get to the furnace.
- Both types of drums are lined up on conveyors leading to the 60-foot natural gas furnace.
- The drums are manually flipped over onto a conveyor belt. Residuals from the drum fall into a box chain under the conveyor. As the drum moves into the furnace, the residuals that have fallen out as well as what remains on the interior of the container are burned out.
- If the residuals from the drums are high energy, at times, thermocouples will shut down the natural gas feed that runs the furnace. Mike Griffin of WDNR has witnessed all of the burners turned off.
- According to Michael Higgins, the operators who line up the containers on the conveyors into the furnace are responsible for sorting the containers to ensure that they are processed in the proper order. Mr. Higgins did not provide any written procedure describing this sorting process.
- An afterburner, or thermal oxidizer to destroy the emissions operates at approximately 1700F. The ash is sprayed with water for cooling as it is dragged under the furnace and dropped into a storage hopper.
- After the drums are burned out, they are processed through shot blasters to remove ash.
- The drums are then reshaped with expanders before they are tested ultrasonically for DOT-conformance.
- After reshaping, an epoxy is beaded around the chime inside the bottom of the container in order to ensure the bottom will not leak.

- The containers are then painted on the exterior and a red chemical resistant paint is applied to the interior. The containers are processed through a drying oven. New bung rings and lids are affixed to the containers as needed.

Waste Generation and Management:

- Ash generated from the burn-out furnace is managed as non-hazardous waste.
- Paint booth filters are managed as non-hazardous wastes.
- Paint lines are not flushed with solvent. The paints are compatible and do not require flushing between colors. Waste paint is reused in-house as "bottom paint." The paint booth is vented to atmosphere, not to the thermal oxidizer.
- 100% acetone is used on rags which are used to clean the paint equipment. Used rags are managed as non-hazardous waste.
- Shot blast waste is currently managed as non-hazardous waste. In 2015, however, the blast media was sent off-site on a hazardous waste manifest for barium and cadmium.
- Silicone-based wastes, which, according to facility personnel are non-hazardous and lack BTU value, are drained out into consolidation containers and managed as non-hazardous wastes. The emptied drum is then burned out in the furnace with higher BTU value waste container residuals in order to maintain furnace efficiency.
- Non RCRA-empty heavies are not managed as waste at this site. According to a DOT inspector, DOT would not consider the material in the drums to be waste if the container has not been cleaned and purged at the site. The material would be considered "residue" and therefore, the drums would not need to be shipped on a hazardous waste manifest, even if the material in the containers is deemed hazardous by the vendor to whom it is returned.
- Containers that are not fit for reconditioning or remanufacturing are squashed for recycling.
- In general, wastes are sent off-site to Badger Disposal and Advanced Waste.

Site Tour

Mike Griffin, of WDNR, took readings with a Multi-Rae monitor that was supplied by Kathy Halbur of EPA, Superfund. Cathy Baerwald of WNDR along with Kathy Halbur were prepared to take samples of opportunity throughout the inspection. No samples were taken, however.

The tour began with an outdoor site walk. We observed dozens of tractor trailers on the property. These trailers contain drums that have not yet been received for processing at the site. Three trans-ocean style shipping containers were stationary and were used for storage of new bung rings and lids for the remanufactured drums.

We toured the maintenance area. One 55-gallon drum of used oil was labeled as "Used Oil." A drain beneath the truck bay fed a sump outside the building. According to Mr. Higgins, the water in that tank from the truck wash is used as quench water for the furnace. We observed stacks of roughly 20 to 30 burned out empty containers that were not to be refurbished, but were to be reused at a scrap yard as is. On one boundary of the property which shares a border with a closed landfill, vent pipes from the landfill were on the MASD-OC side of the fence. It was unknown at the time of the inspection the purpose or significance of those vents.

The outdoor portion of the tour continued to the Heavies dock. Several drums were staged on this dock singly or in palletized groupings. Each container was labeled with a reject label. I observed three different kind of reject labels (red, yellow, and orange/black), the difference between them was not explained during the inspection. The labels generally included the word "Rejected" and a date. None of the dates observed was prior to January, 2017. Behind the dock were rejected totes. MASD-OC does not process totes. It was not explained during the inspection why the totes were accepted at this facility rather than returned to the vendor or immediately shipped to another MASD site (Cornell Facility) that could process the totes.

The furnace area was the last outdoor portion of the site toured. I observed the operator overturning the containers onto the conveyor. I did not discern any free liquid draining from the containers. With Mr. Boyle's assistance, I observed the drums that had been staged for burning by lifting the lids and tilting drums that appeared to have a measurable amount of material at the bottom. Of the containers observed, I noticed several containers that had extremely viscous material that had either solidified in the container or was a soft, waxy, semi-solid in appearance. None of the containers observed had material in it that could be sampled. I also observed the conveyor system into the furnace and which drags the ash back to a lugger box. The conveyor is cleaned periodically to remove accumulated ash which has not been transported to the lugger. The lugger box was not labeled or closed as ash was being continually added to it. The ash is managed as non-hazardous waste.

During the interior portion of the inspection, I observed the blasting area. The steel shot is used to remove residual ash from the container. The drums are then processed through a forming stage to ensure the proper interior diameter of the container. The drum chimes are shaped prior to a second forming stage. The drums are then ultrasonically tested (among other tests and inspections throughout the process), and the chime sealant is applied. This sealant is a one-part epoxy that cures with heat in excess of 190F. The drums continue on to a manual spray paint booth for exterior paints, and on to the interior automated spray booth for the application of a chemical-resistant red paint. The booths are vented to atmosphere. According to Mr. Meyer, the painting process generates very little waste. Filters and rags are managed as non-hazardous, and the waste paint is mixed to be used as non-specification bottom paint.

On the way to the "cutter" room, I observed a staging dock for incoming drums. The drums appeared to have previously contained a variety of chemicals including corrosive and toxic characteristics. Mr. Higgins explained that this facility can handle a much greater variety of container residues because the burn-out process is more efficient and effective than the washing process at the MASD-St. Francis site, which can only process containers which held materials with low viscosity that rinse out only with a caustic hot water. All plastic drums, of course, are also processed at St. Francis.

The final interior area visited was the "cutter" room where tight-head drum tops are cut off. Drums were not being processed while we were in this area. I noticed a strong organic odor, and the Multi-RAE indicated the presence of organics. The observable drums on the conveyor did not appear to contain a pourable amount of residue. Each container observed on the conveyor (or observed in the cutter room as applicable) appeared to be RCRA-empty.

The tour concluded at this point and the inspection team returned to the meeting to close out the inspection and provide the facility attorneys with a document request list.

Records and Emergency Preparedness Review

I did not review emergency preparedness procedures for the facility. A question did arise during the CEI regarding the Facility procedures for preventing possible emergencies that may occur due to mixing of incompatible wastes. The concept of RCRA empty containers was discussed in this context. The Facility does not have any written procedures that are followed to ensure containers are RCRA empty upon acceptance. As mentioned above, the operators use a "feel" of the container to help determine RCRA-empty status.

Records were not reviewed during the CEI. A list of records requested by each media during the CEI was provided to the Facility representatives. A copy of the list is included in Attachment C.

Closing Conference

During the closing conference with the MASD-OC representatives, each media discussed any observations made during the CEI. We provided the representative with the list of documents that were being requested. For my part, I informed Facility representatives that I would be generating a report that included a letter, narrative discussion of the CEI and attendant photographs and checklists. Any response needed from MASD-OC according to the letter would be expected within 30 days.

The following items were discussed with MASD-OC personnel at the close of the inspection.

- Photographs were to be sent to Linda Benfield for CBI determinations. Other information discussed and collected throughout the inspection was not claimed as CBI;
- Expectations for waste determination records;
- Procedures for determining RCRA Empty;
- Procedures for storing and returning heavy containers; and,
- Reactivation of the EPA ID number for this site.

Appendices

Appendix A: Photograph Log
Appendix B: Small Quantity Generator checklist
Appendix C: Documents provided to the Facility during the CEI

Appendix A

Photograph Log

Inspection Date:
March 2, 2017

Facility Name and ID Number:
Mid-America Steel Drum
EPA ID: WID045953189

Inspector and Photographer:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

Camera Used:
Olympus Stylus 600
Serial Number: A47525904

Photograph 1

Taken at 12:06 p.m. CST

This photograph is an overview of some of the containers on the "Heavies" dock.

This photograph is protected under CBI and is not included in the public record.

File Name: P3020013

Photograph 2

Taken at 12:06 p.m. CST

This photograph is a close-up of a "Rejected" label on a "Heavy" drum. The label includes the customer name and the rejection date.

This photograph is protected as CBI and is not included in the public record.

File Name: P3020014

Photograph 3

Taken at 12:08 p.m. CST

Two 55-gallon drums that were identified as "Heavy" were marked as "Junk Ink."

This photograph is protected as CBI and is not included in the public record.

File Name: P3020015

Photograph 4

Taken at 12:09 p.m. CST

This photograph is an overview of the containers that have been identified as "Heavy."

This photograph is protected as CBI and is not included in the public record.

File Name: P3020016

Photograph 5

Taken at 12:40 p.m. CST

This open-head containers have been prepped for burning and are staged near the furnace.

This photograph is protected as CBI and is not included as part of the public record.

File Name: P3020017

Photograph 6

Taken at 12:41 p.m. CST

These drums were staged on or near the conveyor belt leading up the furnace. The operator in the photograph flips each drum over in order for the ash to fall out of the container during burn out.

This photograph is protected as CBI and is not included in the public record.

File Name: P30200018

Photograph 7

Taken at 12:41 p.m. CST

This photograph is essentially a duplicate of Photograph 6, sans operator.

This photograph is protected as CBI and is not included in the public record.

File Name: P3020019

Photograph 8

Taken at 1:19 p.m. CST

This photograph shows 10 stainless steel totes that had been rejected as "heavy." The Oak Creek facility does not process totes. It was not made known during the inspection why these totes had not been immediately rejected back to the vendor without being off-loaded at this site.

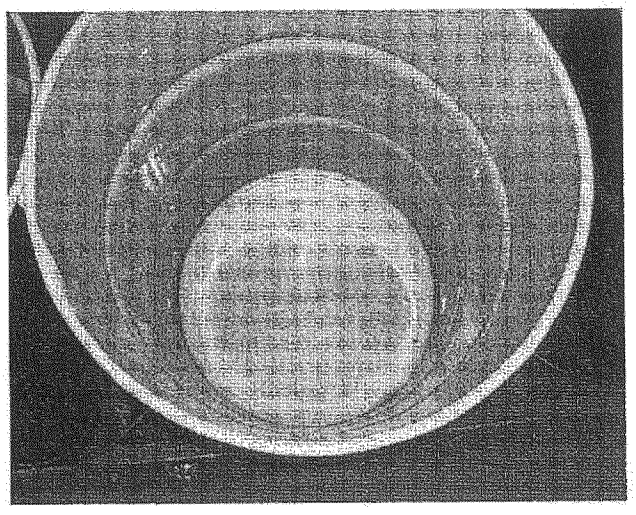
This photograph is protected as CBI and is not included in the public record.

File Name: P3020020

Photograph 9

Taken at 1:45 p.m. CST

This photograph was taken in the room where the lids are cut off of tight-head drums. This container held a pourable amount of viscous material that had accumulated at the bottom of the container.



Appendix B

Checklist

Inspection Date:
March 2, 2017

Facility Name and ID Number:
Mid-America Steel Drum
EPA ID: WID045953189

Inspector:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

MID AMERICA STEEL DRUM
OAK CREEK, WI WID045953189

SMALL QUANTITY GENERATOR INSPECTION

Revision: 06/29/2016
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate between 100 kg (220 lbs) and 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month and less than 1 kg of acute hazardous waste in a calendar month , evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated (NR 662.011).	Y	662.190(2)
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)). DOCUMENTS HAVE BEEN REQUESTED	UN	662.190(2)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1).	UN	662.190(2)
D. Generator keeps records of any test results, waste analysis or other determinations for at least three years from the date the waste was last sent to a treatment, storage or disposal facility.	UN	662.193(1)(b)
E. Generator submitted a notification form and obtained an EPA ID# (NR 662.012). Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.190(2)

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator sends waste off-site to be reclaimed under a contractual agreement. If NO, go to Question 2.E.	NO	
B. Type of waste and frequency of shipments are specified in the contractual agreement.	N/A	662.191(1)(a)
C. Vehicle used to transport the waste to the recycler and back to the generator is owned and operated by the reclaimer.	N/A	662.191(1)(b)
D. Copy of the reclamation agreement is maintained for at least 3 years from the date the agreement is terminated or expires.	N/A	662.191(2)
E. Generator sends hazardous waste off-site that is not reclaimed under a contractual agreement. If NO, go to Question 2.K.	Y	
F. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1). DOCUMENTS HAVE BEEN REQUESTED	UN	662.190(2)(a)
G. The facility designated on the manifest is permitted or licensed to accept the waste (NR662.020(2)).	UN	662.190(2)(a)
H. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).	UN	662.190(2)(a)
I. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262 (NR 662.020(1)).	UN	662.190(2)(a)
J. If the generator received a shipment back as a rejected load, the returned waste has been accumulated in compliance with the container or tank standards for less than 180 days.	N	662.192(5)
K. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.192(5)

SMALL QUANTITY GENERATOR INSPECTION

Revision: 06/25/2015
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

L. Copy of the manifest is signed by the generator and retained until the signed copy from the designated facility is received.	UN	662.193(1)(a)
M. Copy of each manifest is kept for at least three years from the date of shipment.	UN	662.193(1)(a)
N. Hazardous waste is packaged according to applicable DOT requirements before transport (NR 662.030). If no pretransportation activities are taking place during the inspection answer as 'NA' NONE OBSERVED	N/A	662.190.(2)
O. Hazardous waste is labeled according to applicable DOT requirements before transport (NR 662.031). If no pretransportation activities are taking place during the inspection answer as 'NA'	N/A	662.190(2)
P. Hazardous waste is marked according to applicable DOT requirements before transport (NR 662.032(1)). If no pretransportation activities are taking place during the inspection answer as 'NA'	N/A	662.190(2)
Q. Containers of 119 gallons and less are marked with the "Hazardous Waste - Federal law prohibit improper disposal" label before transport (NR 662.032(2)). If no pretransportation activities are taking place during the inspection answer as 'NA'	N/A	662.190(2)
R. Placards are offered to the initial transporter (NR 662.033). If no pretransportation activities are taking place during the inspection answer as 'NA'	Y	662.190(2)

Section 3: Land Disposal Restrictions

RECORDS HAVE BEEN REQUESTED

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	UN	668.07(1)
B. A copy of the LDR notification and certification shall be maintained on-site in the facility records for solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under ss. NR 661.02 to 661.06, or exempted from ch. 291, Stats., and chs. NR 660 to 673, subsequent to the point of generation.	N/A	668.07(1)(h)
C. Generator complies with the prohibition against dilution of wastes.	UN	668.03
D. A one-time written notice is sent to each treatment, storage or disposal facility with the initial waste shipment.	UN	668.07(1)
E. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	UN	668.07(1)
F. If the waste MEETS treatment standards, the LDR notice certifies the wastes may be land disposed without further treatment.	N/A	668.07(1)
G. If the waste EXCEEDS treatment standards, the LDR notice notifies of appropriate treatment and applicable prohibitions.	UN	668.07(1)
H. Copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	UN	668.07(1)(h)

SMALL QUANTITY GENERATOR INSPECTION

Revision: 06/29/2016
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 3: Land Disposal Restrictions

I. Generator with a contractual agreement complies with BOTH of the following: 1. The notification and certification requirements for the initial shipment of the waste subject to the agreement. 2. Retains a copy of the notification and certification with the tolling agreement for at least 3 years after the agreement is terminated or expires.	N/A	668.07(1)(j)
J. Underlying hazardous constituents have been identified for characteristic wastes.	UN	668.09(1)
K. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste code. 2. The treatment standards for all applicable listed and characteristic waste codes.	UN	668.09(2)
L. If waste is treated in containers or tanks, the generator meets with BOTH of the following (NR 668.07(1)(e)): 1. Developed a waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	N/A	662.192(1)(d)

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the previous calendar year have been submitted to the Department by March 1 of the following year.	UN	662.193(3)
B. Copy of each annual report is kept for at least 3 years from the due date of the report.	UN	662.193(1)(c)
C. If the signed manifest copy is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department.	UN	662.193(2)

Section 5: Preparedness and Prevention

A. Generator has ALL of the following equipment, unless the equipment is not necessary for the types of wastes handled (665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	NI	662.192(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (665.0033).	NI	662.192(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (665.0034).	NI	662.192(1)(d)

SMALL QUANTITY GENERATOR INSPECTION

Revision: 06/29/2018
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 5: Preparedness and Prevention

D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037(1)): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the potential resulting injuries or illnesses.	NI	662.192(1)(d)
E. Aisle space is provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035). "RCRA EMPTY" DRUMS ARE STACKED W/OUT AISLE SPACE	N	662.192(1)(d)

Section 6: Emergency Procedures & Personnel Training Requirements

A. A person has been identified as an emergency coordinator who is responsible for coordinating all emergency response measures and is on the premises or able to reach the site within a short period of time.	Y	662.192(1)(e)1
B. ALL of the following information is posted next to the telephone: 1. Name and telephone number of the emergency coordinator. 2. Location of fire extinguishers, spill control material and, if present, fire alarm. 3. Telephone number of the fire department unless the generator has a direct alarm.	NI	662.192(1)(e)2
C. In the event of an emergency, the emergency coordinator takes the following actions: 1. In the event of a release, telephone the division of emergency management (800-943-0003) and comply with NR 706. 2. In the event of a fire, call the fire department or attempt to extinguish the fire, if appropriate. 3. In the event of a spill, contain the flow of hazardous waste to the extent possible and clean up the hazardous waste and contaminated materials or soil. 4. If there is a release that could threaten human health outside the facility or if a spill reaches surface water, immediately notify the national response center (800-424-8802).	NI	662.192(1)(e)4
D. All employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal operations and emergencies.	NI	662.192(1)(e)3

Section 7: Container Accumulation

A. Generator accumulates hazardous waste in containers. If NO, go to Section 8. NONE OBSERVED	No	
B. The accumulation start date is clearly marked and visible for inspection on each container.	N/A	662.192(1)(d)1
C. All containers are clearly marked with the words "Hazardous Waste".	N/A	662.192(1)(d)2
D. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).	N/A	662.192(1)(b)
E. Containers are made or lined with materials compatible with the waste (NR 665.0172).	N/A	662.192(1)(b)

SMALL QUANTITY GENERATOR INSPECTION

Revision: 08/29/2016
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 7: Container Accumulation

F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N/A	662.192(1)(b)
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	N/A	662.192(1)(b)
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	N/A	662.192(1)(b)
I. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	N/A	662.192(1)(b)
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	N/A	662.192(1)(b)
K. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	N/A	662.192(1)(b)

Section 8: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 9. NONE OBSERVED	No	
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	N/A	662.192(4)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	N/A	662.192(4)(a)
D. Containers are always kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N/A	662.192(4)(a)1
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	N/A	662.192(4)(a)1
F. Containers are marked "Hazardous Waste" or with other words that identify the contents.	N/A	662.192(4)(a)2
G. If the container is leaking or in poor condition, contents are transferred to another container in good condition (NR 665.0171).	N/A	662.192(4)(a)1
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	N/A	662.192(4)(b)
I. Generator complies with the 180 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	N/A	662.192(4)(b)

SMALL QUANTITY GENERATOR INSPECTION

Revision: 05/26/2016
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 9: Used Oil

A. Used oil is managed on-site. If NO, go to Section 10.	No	
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	N/A	679.10(2)(a)2
C. Used oil containers and tanks are in good condition and not leaking.	N/A	679.22(2)
D. Used oil containers and tanks are marked "used oil".	N/A	679.22(3)(a)
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling arrangement.	N/A	679.24
F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.	N/A	679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N/A	679.23
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N/A	679.11

Section 10: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 11. NONE OBSERVED Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.	N/A	
B. Universal waste has not been disposed, treated or diluted. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	N/A	673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	N/A	673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	N/A	673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	N/A	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler.	N/A	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.15(2)

SMALL QUANTITY GENERATOR INSPECTION

Revision: 06/29/2016
WASTE & MATERIALS MANAGEMENT PROGRAM

Section 10: Universal Waste

H. Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.	N/A	673.15(3)
I. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	N/A	673.16
J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.	N/A	673.17
K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section.	N/A	673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	N/A	673.18(3)
M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.	N/A	

Section 11: Waste Minimization Certification

A. Small quantity generator has made a good faith effort to minimize the amount of waste generated (NR 662.027(2)).	UN	662.190(2)(a)

Section 12: Generator Status Evaluation

A. Between 220 lbs (100 kg) and 2,205 lbs (1,000 kg) of waste is generated in any month. Not recently	UN	662.190(1)
B. Waste is accumulated for 180 days or less.	N/A	662.192(1)
C. Waste is accumulated for 270 days or less if the generator must ship 200 miles or more.	N/A	662.192(2)
D. Less than 13,230 lbs (6,000 kg) of waste is accumulated.	Y	662.192(1)(a)
E. Describe any other activities the generator is conducting at the facility.		

Appendix C

Documents generated during the Inspection:

- Sign-in Sheet
- Record Request Sheet

Inspection Date:
March 2, 2017

Facility Name and ID Number:
Mid-America Steel Drum
EPA ID Number: WID045953189

Inspector:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

March 2, 2017

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Oak Creek
3/2/17

Document List

- Emergency Response Plan
- SPCC Plan
- MSDS Diesel fuel
- Specifications of Diesell fuel tank (double wall) + date of installation
- MSDS VOC 3.5 Paint
- Site Plan
- waste profiles Determination for ash from burner (analyticals if available)
- waste determination for paint filters
- waste determination for baghouse dust

* Industrial Storm Water
  - o Storm water Pollution Prevention Plan (SWPPP)
  - o Inspection Reports
    - Quarterly Visual Inspection (outfalls)
    - Annual Facility Inspection
  - o Storm water monitoring Results (if available)
- Site Plan Showing USTs
- Compounds used in processing the drums
- shipping documents for outgoing waste (hazardous and nonhazardous)
-