U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

FOCUSED COMPLIANCE INSPECTION REPORT

INSPECTION DATE:	July 17, 2017
SITE NAME:	Container Life Cycle Management, LLC d/b/a Mid-America Steel Drum, Inc.
ADDRESS:	3950 South Pennsylvania Avenue St. Francis, Wisconsin 53235
EPA ID NUMBER:	WIR 000 131 367
RCRA STATUS:	Small Quantity Generator (2017)
NAICS CODE:	332439 Other Metal Container Manufacturing
FACILITY CONTACT:	Mark Furgason Plant Manager
EPA CONTACT:	Brian Kennedy Environmental Engineer Compliance Section 2 RCRA Branch Land and Chemicals Division

PREPARED BY: _____ 8/2/2017
Brian Kennedy **Date**

APPROVED BY: _____ 8/2/17
Julie Morris, Chief **Date**
Compliance Section 2

Purpose of Inspection

An unannounced focused compliance inspection at Mid-America Steel Drum, Inc. (MASD), located at 3950 South Pennsylvania Avenue in St. Francis, Wisconsin, took place July 17, 2017. The sampling event was conducted by U.S. Environmental Protection Agency personnel as part of an investigation of the facility's compliance with the regulations of the Resource Conservation and Recovery Act (RCRA), as codified in the Wisconsin Administrative Code and the Code of Federal Regulations. This focused compliance inspection was done in conjunction with ambient air and public soil sampling outside the MASD facility on the same day. The details of the ambient air and public soil sampling outside the MASD facility are not covered as part of this report.

Participants

The following persons were present for part or all of the inspection:

Mark Furgason – Plant Manager	MASD
Lauren Laabs – Consultant for MASD	Mostardi Platt
Brian Kennedy – Environmental Engineer	U.S. EPA
Brenda Whitney – Environmental Engineer	U.S. EPA

Pre-Site Visit

Prior to the focused compliance inspection and sampling event, EPA inspectors completed a Health and Safety Plan (HASP), a Sampling Analysis Plan (SAP), and a Quality Assurance Project Plan (QAPP).

During the morning and early afternoon of July 17, EPA inspectors conducted ambient air sampling and soil screening on public land parcels surrounding MASD. While working outside, EPA inspectors noted a strong chemical odor emanating from the facility. Visible smoke was observed exiting the facility stacks and sinking to street-level along South Pennsylvania Avenue.

While other EPA inspectors began soil sampling outside MASD, Inspector Whitney and myself entered MASD for the focused compliance inspection.

Introduction

EPA Inspector Whitney and myself arrived entered MASD at approximately 1:40 PM CST and signed in at the main office. We spoke with Ms. Tiffany Hupp, MASD's Office Manager, and requested to enter the facility and use screening equipment. Ms. Hupp went to contact Mr. Mark Furgason, MASD's Plant Manager. Soon afterward, Mr. Furgason and Mr. Lauren Laabs, a consultant for MASD with Mostardi Platt, arrived at the front office. We explained that we intended to tour the facility with environmental screening equipment, including a forward looking infrared (FLIR) camera and a Jerome mercury vapor analyzer.

Site Tour

Inspector Whitney and myself were led by Mr. Furgason and Mr. Laabs to MASD's outdoor loading and "heavies" dock on the north side of the facility. We observed MASD employees unloading 55-gallon steel drums from trailers and rolling them onto the nearby process conveyor belt. There were approximately 100 55-gallon drums, stacked three drums high, staged along the west side of the loading dock. Mr. Furgason stated these drums had undergone processing but were rejected because they did not meet quality specifications.

Inspector Whitney and I proceeded to the "heavies" storage area where MASD segregates incoming drums that "feel" heavy because of liquid inside the drum. There were approximately 60 drums in the heavies area, each with a neon yellow reject label on the lid (See Photo 1 in the Inspection Photographs attachment). The labels stated "Rejected or Heavy Drum" and were marked with a tracking number and the customer that sent the drum. The vast majority of these labels had no date. For those labels with a date, the earliest observed was April 17, 2017 (Photo 2).

Inspector Whitney attempted to use the FLIR camera to observe liquids inside the heavy drums. On a high contrast setting ("white hot"), the FLIR camera was able to image the liquid level inside at least one steel drum (Photo 3). It was confirmed that the FLIR camera was imaging the liquid inside the drum by tilting and holding the drum at an angle and observing the resultant contrast change along the lower drum wall. It appeared the FLIR camera was able to image the liquid level inside plastic "poly" drums, but the contrast was less clear (Photo 4). The highest mercury vapor reading in the heavies dock was 300 nanograms per cubic meter, or approximately 0.04 parts per billion.

The tour continued out into MASD's storage yard, where drums are stored in trailers prior to processing. Mr. Furgason indicated that the number of trailers in the storage yard depends on how quickly MASD can process incoming drums, and he referred to the drums waiting to be processed in the storage yard as the facility's equivalent to raw material. Inspector Whitney and I observed dozens of full-size trailers in the storage yard, most of which were closed. The storage yard was not paved. Mr. Furgason stated the trailers contained drums. Many of the trailers were marked "Yard," indicating they had been placed there for storage prior to processing. Other trailers were marked "Shuttle." Mr. Furgason stated those trailers arrived at MASD but would eventually be shipped to Mid-America Steel Drum's facility in Oak Creek, Wisconsin to be burned out. Several of the trailers in the storage yard were open with drums visible inside (Photo 5). It was unclear why certain trailers were open and others were not. One of the open trailers contained both steel and poly drums, and appeared to contain buckets that had tipped over during transit. A poly drum inside this trailer, stacked near the top of containers, was labeled "Sulfuric Acid" and had a corrosive warning label (Photo 6). While observing this trailer, I heard a popping noise inside an adjacent storage trailer. It sounded as if a drum inside the trailer had warped as a result of the daytime heat.

The tour proceeded back inside to MASD's poly drum processing area. Inspector Whitney, with Mr. Furgason, used the FLIR to observe poly drums being unloaded from trailers and placed on the processing line. Inspector Whitney did not observe images of liquid levels in these drums through the FLIR. I observed smoke exiting a process unit in this area. The smoke rose inside the

facility and contributed to a standing haze (Photos 7 and 8). Mr. Laabs explained that the unit was the bake oven for newly-painted steel drums, which cures the coating MASD applies to drums after they pass inspection. Smoke was emanating from the exit of the bake oven where steel drums exit on a conveyor line. I asked Mr. Laabs what the smoke could be and he speculated that it was a combination of combustion byproducts and paint particles. The smoke was white in color and looked similar to the smoke seen outside the facility on South Pennsylvania Avenue. A video of the smoke was taken using the digital camera (See video file MVI_0653.mov). Inspector Whitney imaged the smoke with the FLIR camera. It did not appear to have measurable volatiles content.

Inspector Whitney and I continued to the southern side of the facility and observed a hazardous waste storage area. MASD had accumulated approximately two dozen containers of mercury-containing hazardous waste, including cardboard boxes, 5-gallon buckets and 55-gallon drums (Photo 9). The containers were marked as D009 hazardous waste. The earliest date on a 55-gallon drum in the area was April 24, 2017. The mercury vapor analyzer registered a maximum reading of 200 nanograms per cubic meter in this area, or approximately 0.02 parts per billion. It had been previously indicated by MASD representatives that the facility had received a "bad" drum that caused a mercury contamination event. This hazardous waste was generated as a result of a cleanup response.

Continuing west near the wastewater treatment area, I observed two 55-gallon drums that were previously sampled by EPA during a site visit on May 4, 2017. The drum samples were "SFS08" and "SFS09." Both drums were marked as "Non Hazardous Waste" and "SAVE" (Photos 10 and 11). Near these two drums was another 55-gallon steel drum marked as "Non Hazardous Waste" that appeared to be leaking onto the ground (Photo 12). I attempted to screen the leak with pH indicator paper but the result was inconclusive (Photo 13).

Inspector Whitney and I proceeded up MASD's catwalk to observe the steel drum hot wash tank lines. We observed MASD employees turn over steel drums and place them onto an automated spray nozzle that entered the drum bung hole. The spray nozzle would then carry the steel drum further down the process line for cleaning. Because of our viewpoint and the speed of processing, it was difficult to observe if any pourable material exited the drums when they were overturned. Inspector Whitney used the FLIR camera to image drums that were arriving to the area to be overturned. Inspector Whitney did not observe images of liquid levels in these drums through the FLIR.

The tour ended back inside MASD's main office. Inspector Whitney and I left the site at approximately 3:00 PM CST.

Attachment
Inspection Photographs

Mid-America Steel Drum, Inc.
WIR 000 131 367
July 17, 2017

ATTACHMENT: Inspection Photographs

Photographs were taken by Brian Kennedy using a Canon PowerShot A2400 IS Digital Camera.
Note: Image timestamp was one hour behind actual photograph time at facility.

RCRA Photo Log

Photo	Image File Identifier	Description	Time (CST)	Image Modifications
1	IMG_0647	The "heavies" storage area with approximately 60 drums.	2:01 PM	None
2	IMG_0648	The oldest label observed on a drum in the heavies storage area, dated 4/17/17.	2:08 PM	None
3	FLIR0206	FLIR camera image of liquid line inside a steel drum in the heavies storage area.	Not Recorded	None
4	FLIR0207	FLIR camera image of poly drums inside a trailer that was being unloaded.	Not Recorded	None
5	IMG_0649	An open trailer of drums in the storage yard. It was unclear why this trailer was open.	2:19 PM	None
6	IMG_0650	An open trailer of drums and containers in the storage yard. Drums and containers were stacked and appeared toppled over. It was unclear why this trailer was open.	2:22 PM	None
7	IMG_0651	View of the bake oven with visible smoke near its exit. With camera flash on.	2:29 PM	None
8	IMG_0652	View of the bake oven with visible smoke near its exit. With camera flash off.	2:29 PM	None
9	IMG_0654	The mercury waste storage area.	2:42 PM	None
10	IMG_0656	Previously sampled drum (SFS08) now marked as "Save" near the wastewater treatment area.	2:45 PM	None
11	IMG_0655	Previously sampled drum (SFS09) now marked as "Save" near the wastewater treatment area.	2:25 PM	None
12	IMG_0657	A leaking drum marked as "Non Hazardous Waste" near the wastewater treatment area.	2:47 PM	None
13	IMG_0658	Inconclusive pH indicator paper result on the liquid in the leak seen in Photo 12.	2:47 PM	None

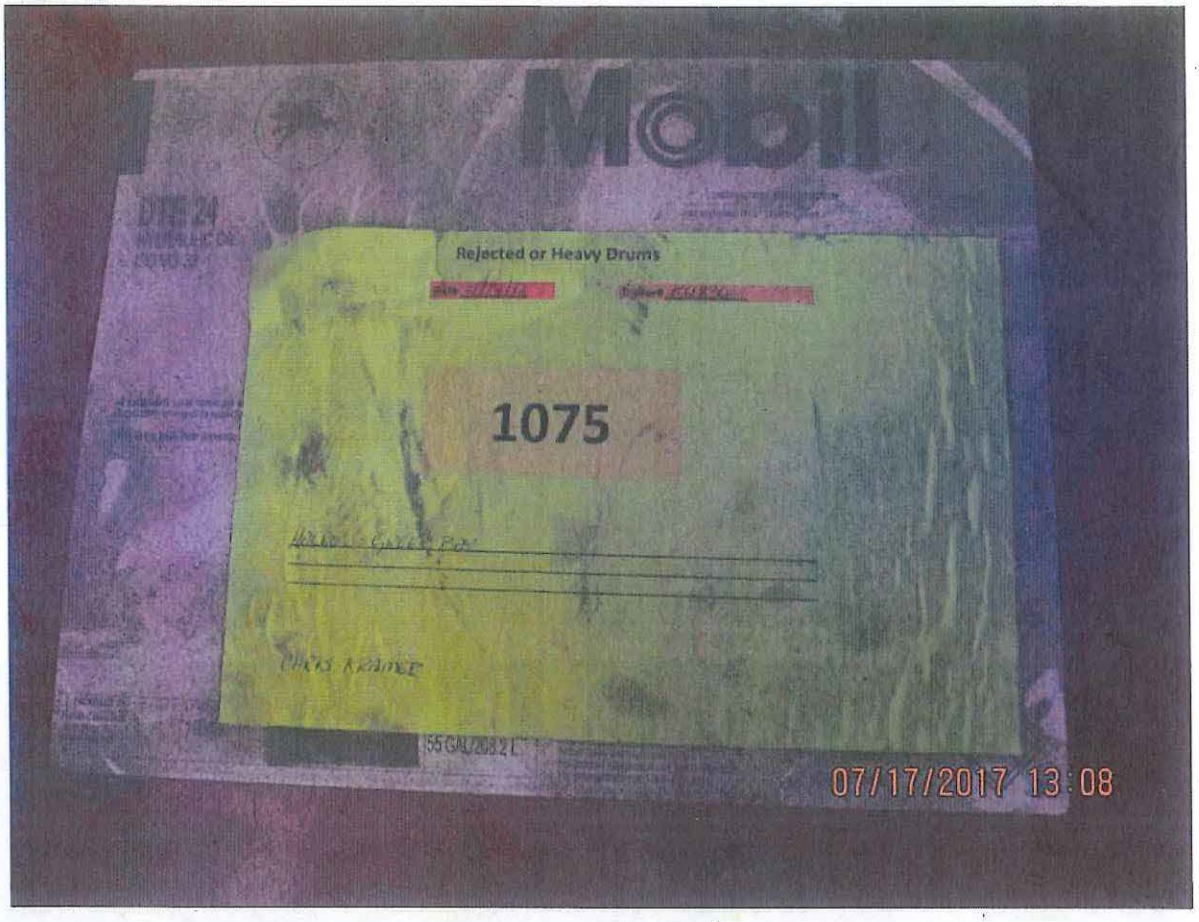
Mid-America Steel Drum, Inc.
WIR 000 131 367
July 17, 2017

Photo 1:

Attachment: Inspection Photographs

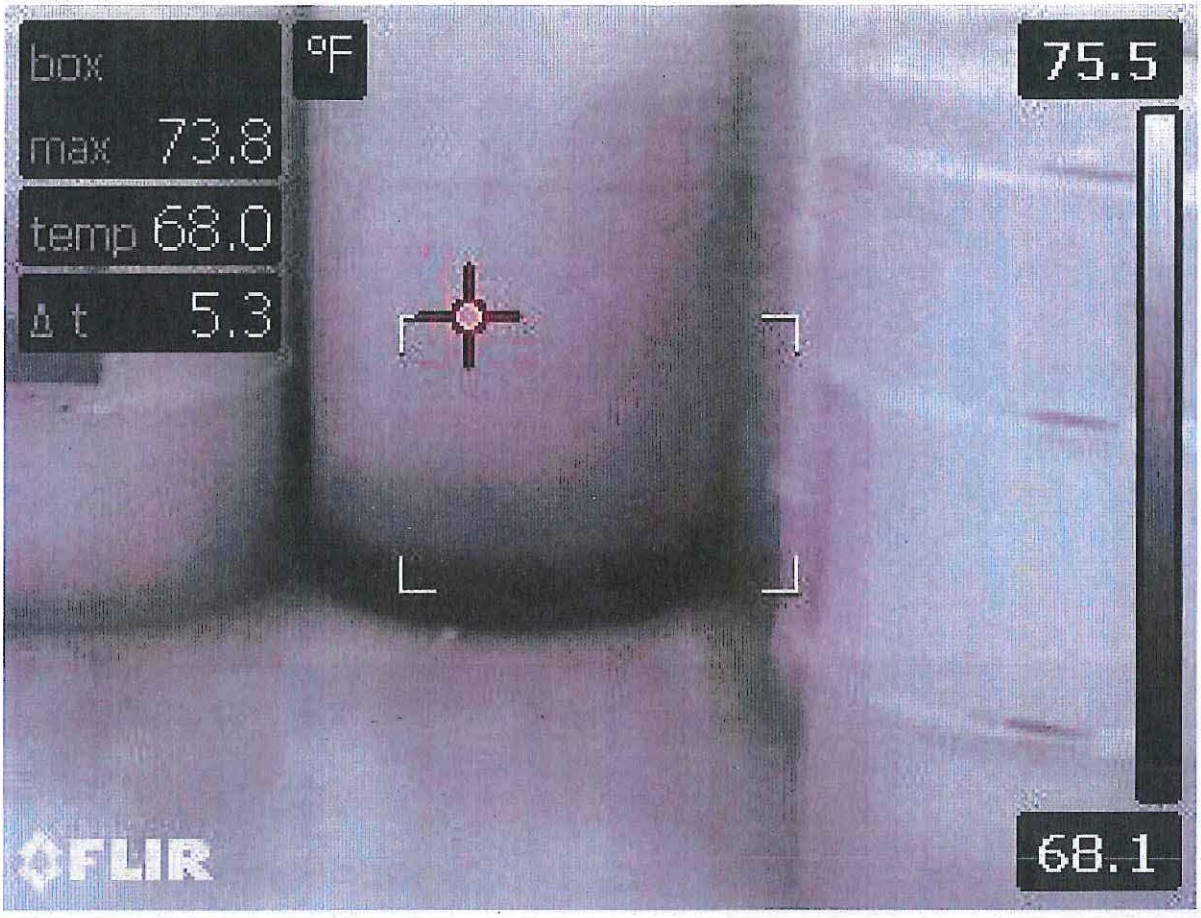
Mid-America Steel Drum, Inc.
WIR 000 131 367
July 17, 2017

Photo 2:



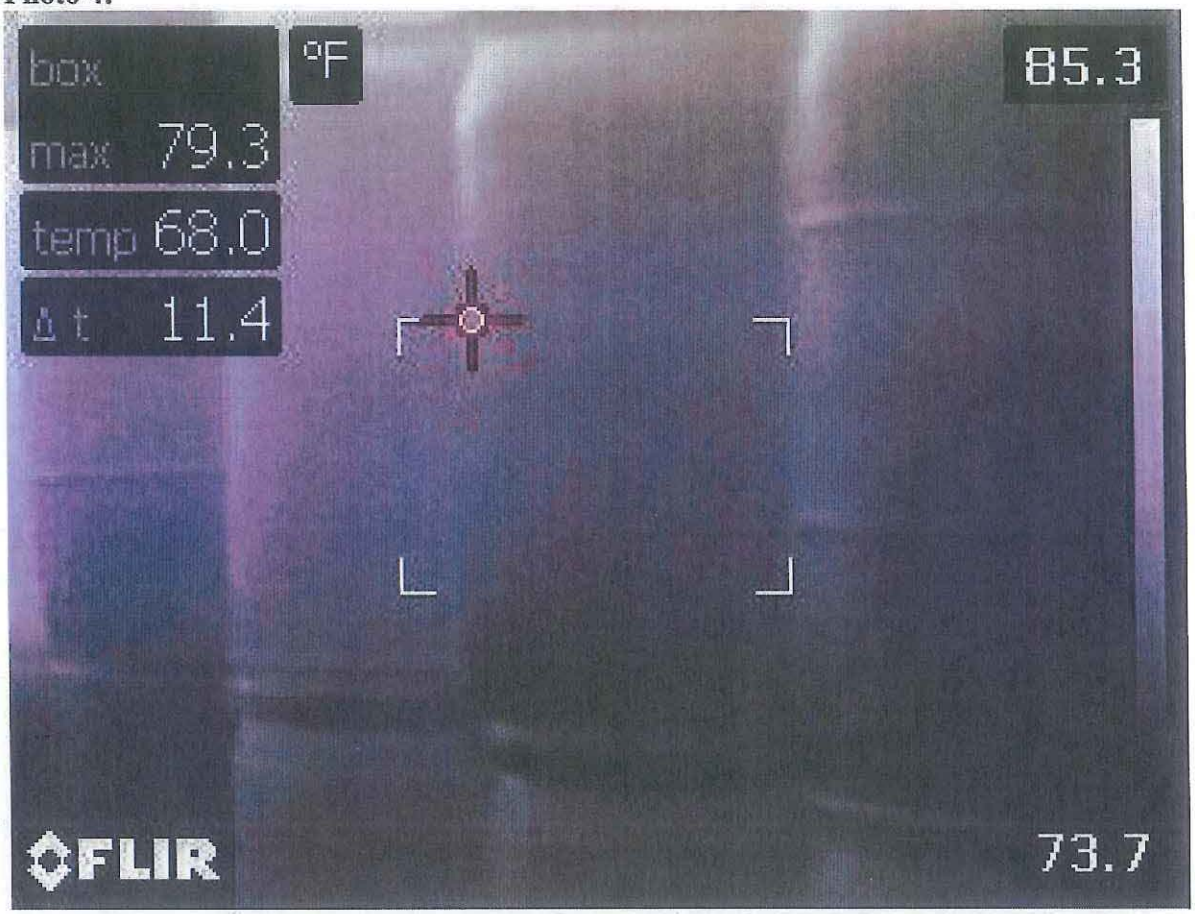
Attachment: Inspection Photographs

Photo 3:



Attachment: Inspection Photographs

Photo 4:



Mid-America Steel Drum, Inc.
WIR 000 131 367
July 17, 2017

Photo 5:

Attachment: Inspection Photographs

Photo 6:

Attachment: Inspection Photographs

Photo 7:

Attachment: Inspection Photographs

Photo 8:

Photo 9:

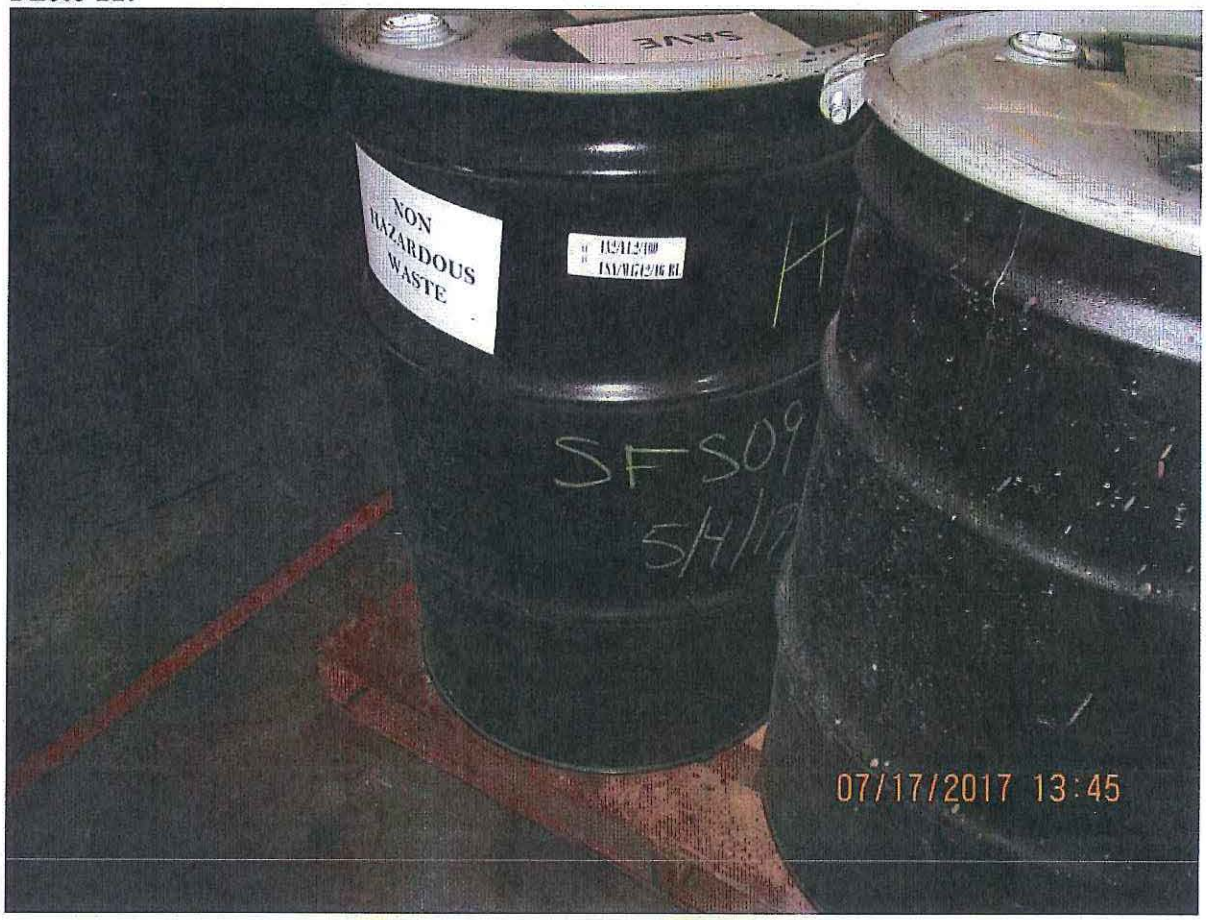
Attachment: Inspection Photographs

Photo 10:


NON HAZARDOUS WASTE
SAVE
NON-HAZARDOUS WASTE
07/17/2017 13:45

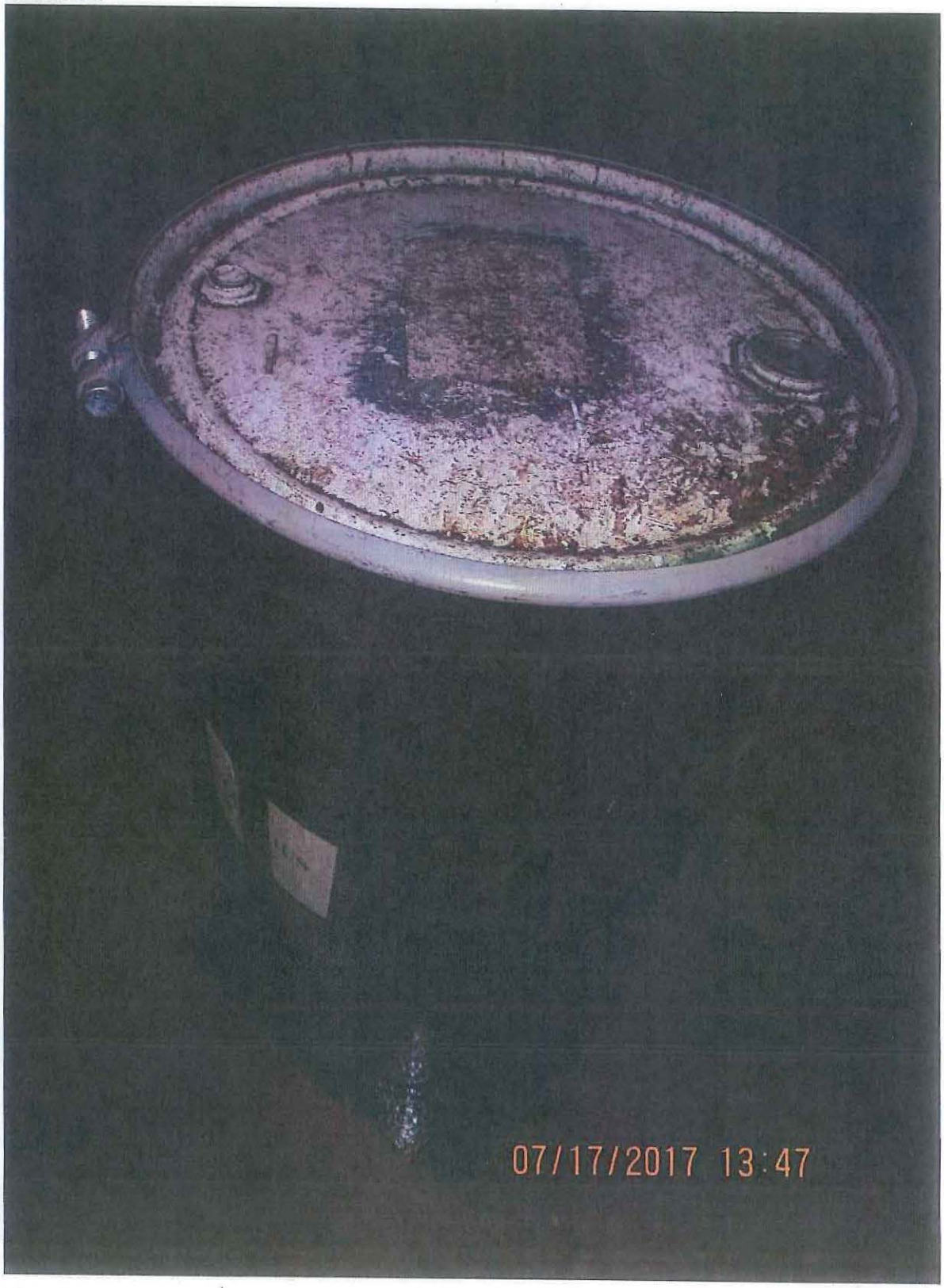
Mid-America Steel Drum, Inc.
WIR 000 131 367
July 17, 2017

Photo 11:



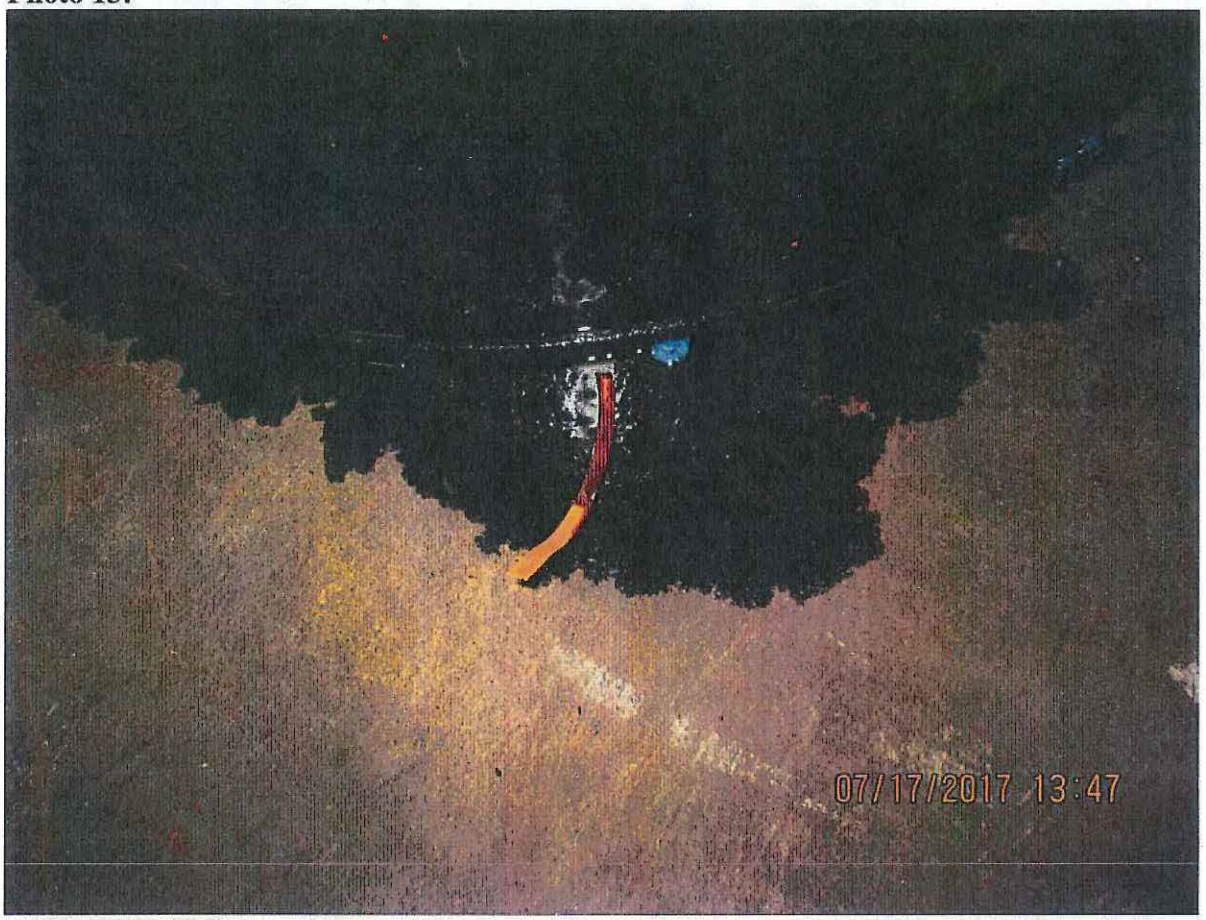
Attachment: Inspection Photographs

Photo 12:



Attachment: Inspection Photographs

Photo 13:



Attachment: Inspection Photographs