

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

RCRA SAMPLING REPORT

FACILITY NAME: MID-AMERICA STEEL DRUM IBC
FACILITY U.S. EPA ID NO.: WIR 000 162 438
FACILITY TYPE: Small Quantity Generator
FACILITY ADDRESS: 2300 West Cornell Street
Milwaukee, Wisconsin 53209
U.S. EPA REPRESENTATIVE: Walt Francis
DATE OF INSPECTION: May 4, 2017
NAICS CODE: 332439 – Other Metal Container Manufacturing

PREPARED BY: Walt Francis
Walt Francis
Environmental Scientist

7/24/2017
Date

APPROVED BY: Julie Morris
Julie Morris, Chief
Compliance Section 2
RCRA Branch

7/24/17
Date

Purpose of Sampling Event

An unannounced Sampling Event at Mid-America Steel Drum IBC ("MASD-CS") located at 2300 West Cornell Street, in Milwaukee, Wisconsin took place on May 4, 2017. MASD-CS has notified as small quantity generator (SQG) of hazardous waste. Robert Kendreck accompanied me during this event. In addition to facility representatives, an attorney from the law firm Foley & Lardner LLP was present during the event.

The Sampling Event was conducted at three MASD facilities in the Milwaukee area simultaneously in order to obtain analytical data in order to supplement an evaluation of MASD's compliance at these three facilities with the appropriate hazardous waste regulations codified at the Wisconsin Administrative Code and the code of Federal Regulations. This report is a record of the MASD-CS facility sampling event only. Reports for the other two facilities are written under separate cover.

Participants

United States Environmental Protection Agency (U.S. EPA) -
Walt Francis, RCRA Program
Robert Kondreck, Superfund Program

Representatives of Mid-America IBC –
Rodney Knash, Plant Supervisor
Jared Suhm – Plant Employee
Scott Allen, Attorney Foley and Lardner, LLP

Introduction

Mid-America Steel Drum Company was established in 1975. Mid-America Steel Drum has three locations in Milwaukee County (3950 S. Pennsylvania Avenue, St. Francis, 8570 S. Chicago Road, Oak Creek, and 2300 W. Cornell St., Milwaukee, Wisconsin). The Cornell Street facility receives 275-gallon plastic and metal totes. The totes are typically stored prior to processing. Tote processing includes the removal of any liquid contents with a shop vacuum apparatus. The removed liquids are accumulated in 275-gallon totes and sent off-site 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 IBC also operated a "Cut and Scrape Operation" at the Milwaukee facility. Totes which had residues on the bottom were placed in a saw apparatus which cuts off the bottom of the tote. At the time of the Sampling Event, the Cut and Scrape Operation had been discontinued. The MASD-CS 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.

Pre-Site Visit

Prior to the sampling event, EPA personnel completed a Health and Safety Plan (HASP), a Sampling and Analysis Plan (SAP), and a Quality Assurance Project Plan (QAPP). An ex parte administrative warrant from the U.S. District Court Eastern District of Wisconsin was issued on May 2, 2017.

Site Visit

Mr. Kondreck and I arrived at the MASD-CS facility at approximately 10:00 am. The sampling team entered the facility through the truck gate and entered the facility by the loading dock. We went to the office and introduced ourselves to Mr. Rodney Knash and handed him the sampling warrant. We explained that we would be sampling at the site that day, and the warrant allowed us access to the site. Mr. Knash stated that he should make a few telephone calls and to wait for their attorney's. We told Mr. Knash that the sampling warrant allowed us access to the facility without their attorney's present. We then toured the facility with Mr. Knash and discussed sampling locations. All totes had been removed from the outside areas around the building, the "Cut and Scrape Area" activities had been discontinued, the Shop Vacuum area waste tote was labeled "Non-Regulated", and facility operations had stopped. A short time later, Mr. Scott Allen from Foley and Lardner, LLP arrived at the facility. Mr. Knash had sent an employee from the facility out to purchase sampling bottles for split samples. The sampling team worked on labeling sampling containers, Chain of Custody form, and donned our safety PPE.

The first sample (CS-01) was taken from a tote staged near the office which was labeled "Dow Ringwood Returns Heavy", see photograph numbers 1 through 3. Mr. Suhm was given split samples for MASD at each sampling location. We then sampled two totes (CS-02 and CS-03) that were staged near the office waiting to be processed which appeared to be not "RCRA Empty", see photographs number 4 through 6. We then walked back to the Shop Vacuum area and sampled a waste tote (CS-04) which was labeled "Non-Regulated, see photograph number 7. We then sampled another tote (CS-05) from the Shop Vacuum Area which was labeled "Non-Regulated" which was staged in the wastewater tank area, see photograph number 8. The sampling team walked back to the Warehouse Area where we sampled a tote (CS-06) labeled "Pre-Flush #3 Non-Regulated" (see photograph number 9) and a 55-gallon container labeled "Pre-Flush Tank Residue Non-Regulated" (CS-07), see photograph number 10. We walked through the Warehouse Area and selected a tote waiting to be processed labeled "Sodium Hydroxide 10%", which appeared to have more than one gallon of residue in the bottom (CS-08), see photograph number 11. About this time, EPA, Region 5, Clean Air Act personnel, Ms. Alexandra Letuchy and Manojkumar Patel arrived in the Warehouse Area.

We then walked back to the lunch room to take off our PPE.

Mid America Steel Drum – Cornell Street Sampling

Sample Number	Location	Sample Time	Information From Tote Label and SDS Information	Multi-Rae PID Reading
CS-01	Near Office Area	11:48 am	Dow Rocima BT 2S Microbicide EPA Reg No. 707-314 Danger – Corrosive pH = 12 to 13.5 Flash Point = 199 ^o F	190 ppb
CS-02	Staged near Office Area for Processing Off-loaded 5/4/2017	12:31 pm	Silicone Fluid Wacker AK350 Wacker 25595122 pH = 7 Flash Point = 500 ^o F	220 ppb
CS-03	Staged near Office Area for Processing Off-loaded 5/4/2017	12:35 pm	Poly G-30-168 Brenntag Monument MTL pH = 6 Flash Point = Unknown	140 ppb
CS-04	Shop Vac Area	1:02 pm	Tote of combined waste residues labeled “Non-Regulated”– Syrupy consistency	120 ppb
CS-05	Wastewater Tank Room	1:12 pm	Shop Vac Area tote stored in Wastewater tank room labeled “Non-Regulated”. Tote of combined waste residues.	1,120 ppb
CS-06	Northwest Corner of Warehouse	1:29 pm	Tote labeled “Pre-Flush Tank #3 – Non-Regulated” Wash water waste from tote rinsing from 500 gallon tank.	70 ppb
CS-07	Northwest Corner of Warehouse	1:55 pm	55-Gallon Container labeled “Pre-Flush Tank Residue Non-Regulated” Residue waste from washwater tank.	0 ppb
CS-08	Southside of Warehouse Area	2:15 pm	Sodium Hydroxide 10% Brenntag Corrosive DOT 1824 UN1824 GL53584 pH = 14 (5% solution) Flash Point = Non-combustible.	0 ppb

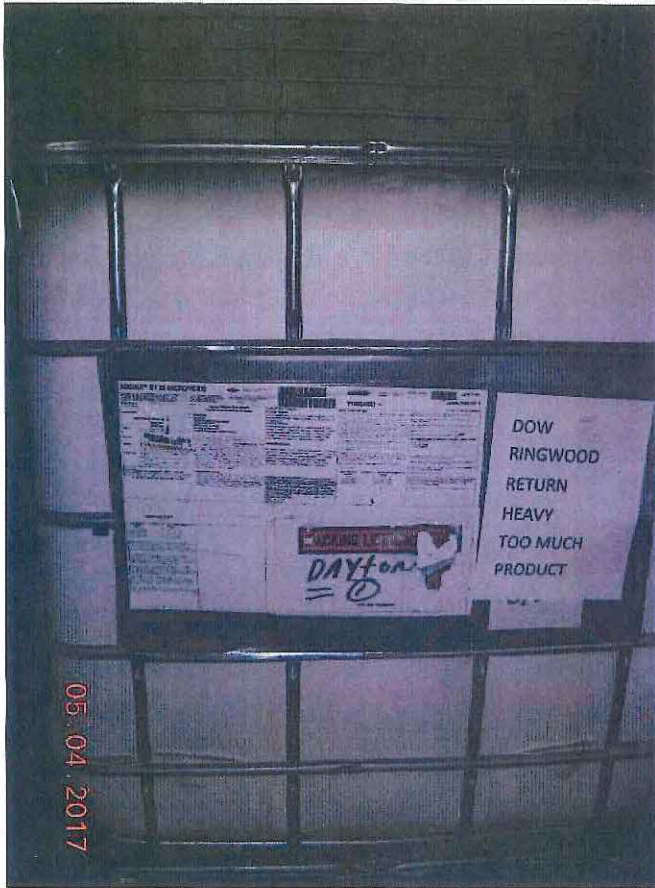
Sampling Completion

We prepared a sample receipt for Mr. Knash and departed the facility at approximately 3:15 pm. The EPA Multi-Rae PID recorded VOC readings ranging from 0 to 1,120 ppb, see table. Samples were packed in a cooler with ice for transport to the EPA, Region 5, Central Regional Laboratory.

Attachments

Photographs
Chain of Custody
Receipt for Samples

Mid-America Steel Drum IBC
Milwaukee, Wisconsin
5/4/2017



Photograph #1 – Dow Ringwood Tote “Return Heavy Too Much Product” Near Office Area
11:34 am CST

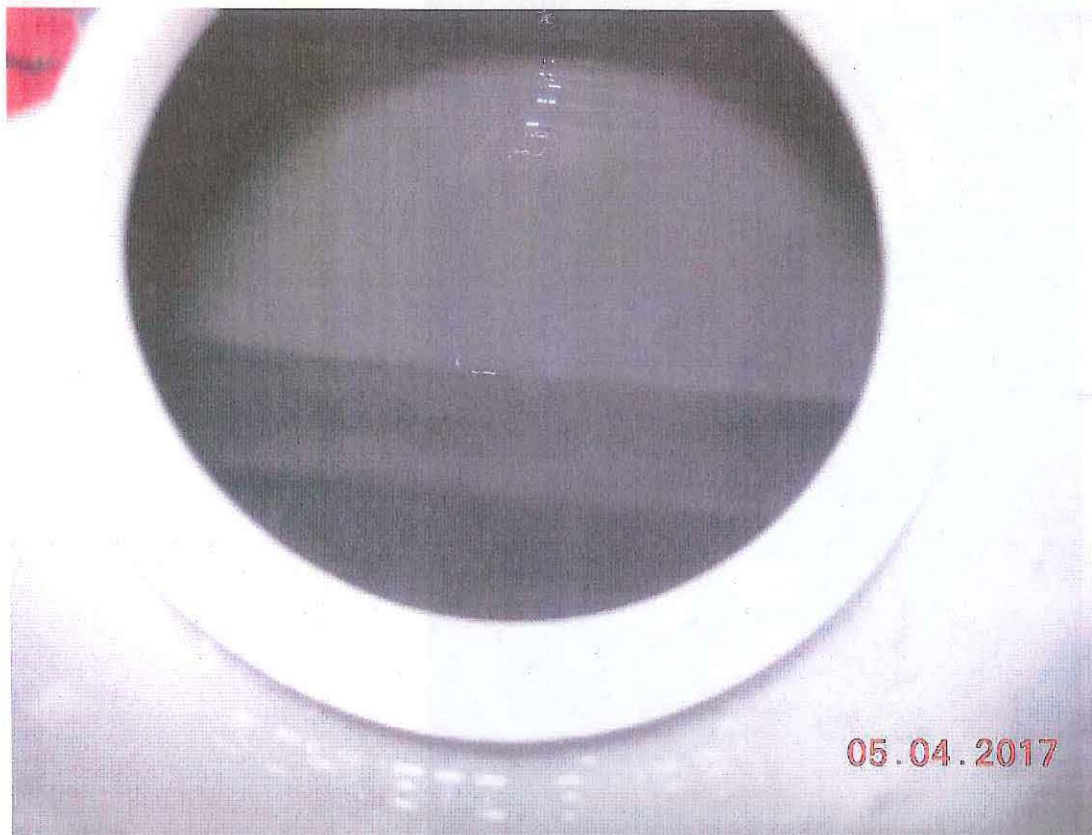


Photograph #2 – Dow Ringwood Tote “Return Heavy Too Much Product” Near Office Area,
11:34 am CST

Mid America Steel Drum IBC
Milwaukee, Wisconsin
5/4/2017

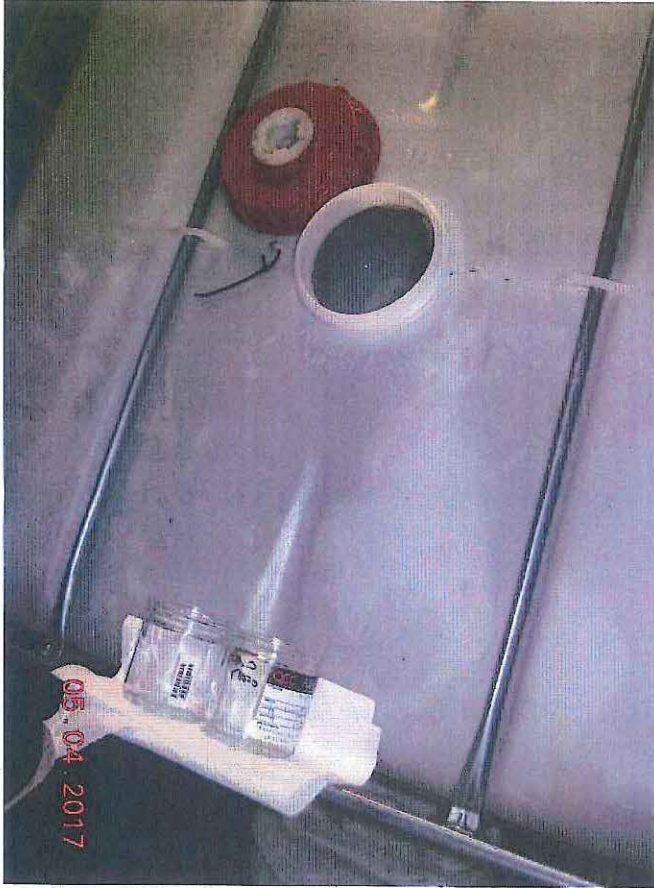


Photograph #3 – Sample CS-01, Dow Ringwood Tote “Too Much Product Return Heavy” Near Office Area, 12:05 pm CST



Photograph #4 – Sample CS-02, Tote to be processed labeled Silicone Fluid Wacker AK350, 12:16 pm CST

Mid-America Steel Drum IBC
Milwaukee, Wisconsin
5/4/2017

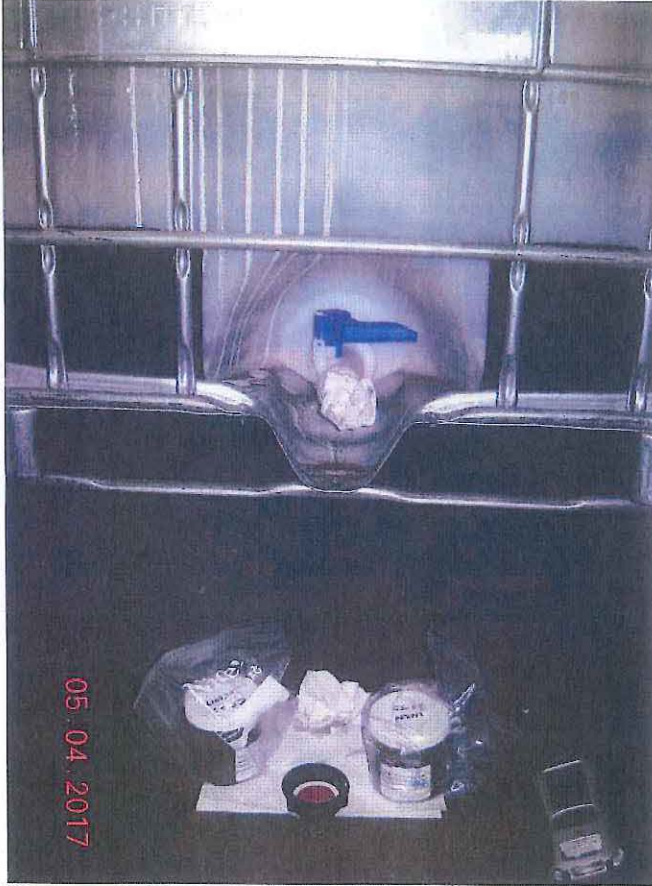


Photograph #5 – Sample CS-02, Tote to be processed labeled Silicone Fluid Wacker AK350, 12:17 pm CST

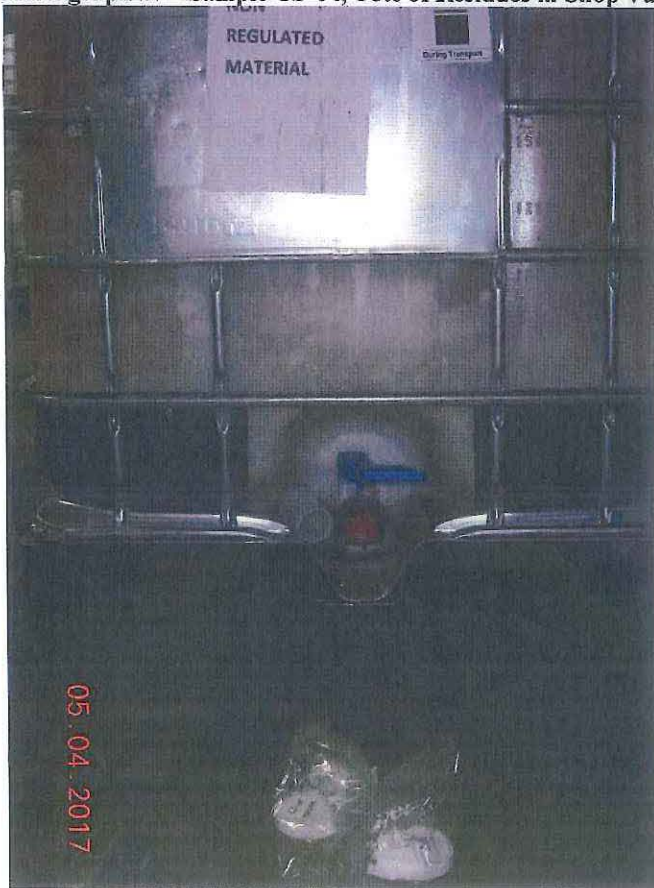


Photograph #6 – Sample CS-03, Tote to be processed labeled Poly-G-30-168, 12:41 pm CST

Mid America IBC
Milwaukee, Wisconsin
5/4/2017

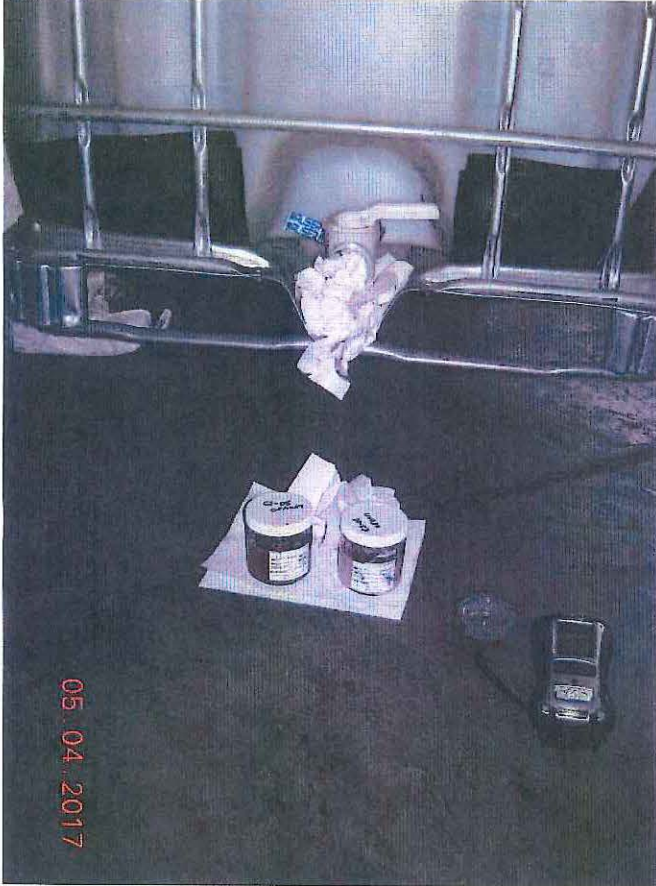


Photograph #7 – Sample CS-04, Tote of Residues in Shop Vac Area, 12:53 pm CST

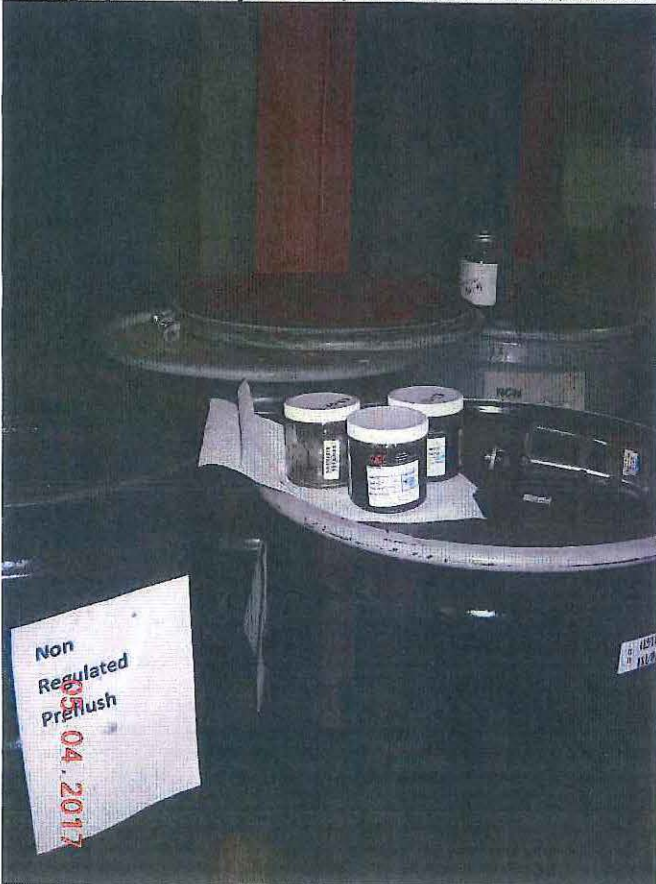


Photograph #8 – Sample CS-05, Tote of Residues from Shop Vac Area, 1:05 pm CST

Mid America IBC
Milwaukee, Wisconsin
5/4/2017

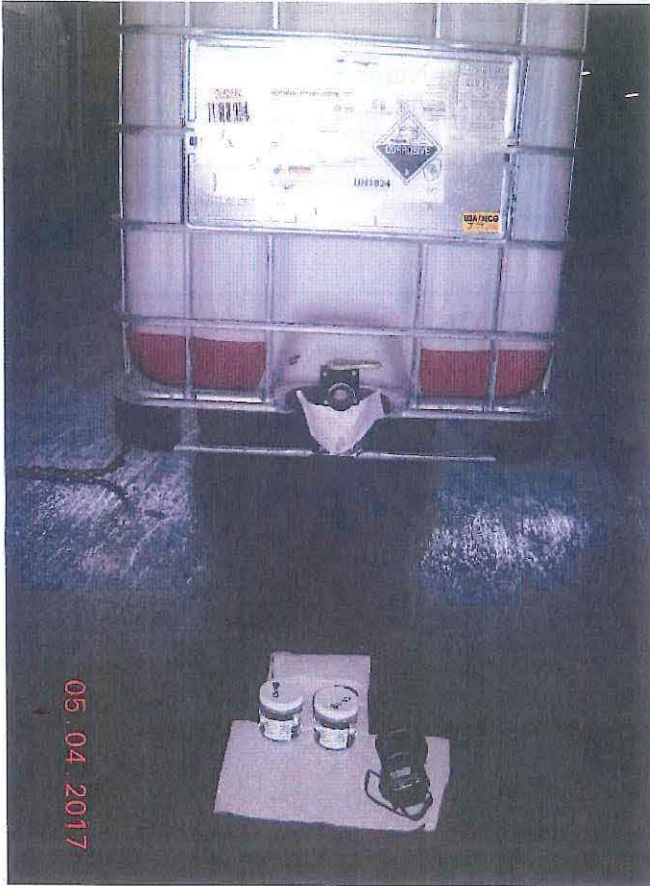


Photograph #9 – Sample CS-06, Warehouse Tote labeled Non-Regulated “Pre-Flush #3”, 1:22 pm



Photograph #10 – Sample CS-07, 55-Gallon Container labeled Non-Regulated “Pre-Flush”, 1:45 pm CST

Mid America IBC
Milwaukee, Wisconsin
5/4/2017

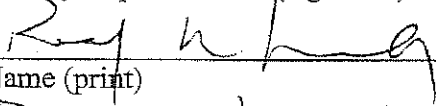



Photograph #11 – Sample CS-08, Tote to be processed labeled “Sodium Hydroxide”, 2:07 pm CST



U.S. Environmental Protection Agency
Region 5

RECEIPT FOR SAMPLES

Name of Facility Mid America Steel Drum		Project Number MASD-05-04-17	
Facility Location 2300 W. Cornell Street, Milwaukee, Wisconsin 53209			
DESCRIPTION			
CS-01 CS-02 CS-03 CS-04 CS-05 CS-06 CS-07 CS-08			
Facility Representative (signature) 		EPA Representative (signature) 	
Name (print) RODNEY KNASH		Name (print) Walt Francis	
Title PLANT SUPERVISOR	Date Signed 5-4-2017	Title Environmental Scientist	Date Signed 5/4/2017

Distribution: Original to Facility Representative; Copy to Project File



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

RCRA SAMPLING REPORT

INSPECTION DATE: May 4, 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

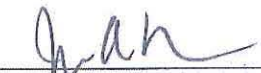
RCRA STATUS: Small Quantity Generator (2017)

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:  7/7/2017
Brian Kennedy Date

APPROVED BY:  7/7/17
Julie Morris, Chief Date
Compliance Section 2

Mid-America Steel Drum, Inc.
WIR 000 131 367
May 4, 2017

Purpose of Inspection

An unannounced sampling event at Mid-America Steel Drum, Inc. (MASD), located at 3950 South Pennsylvania Avenue in St. Francis, Wisconsin, took place May 4, 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. Simultaneous sampling events of additional Mid-America Steel Drum, Inc. facilities in Oak Creek and Milwaukee, Wisconsin took place on the same day. The details of the sampling events at the Oak Creek and Milwaukee facilities are not covered in this report.

Participants

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

Mark Furgason – Plant Manager	MASD
Robert Janowski – Plant Engineer	MASD
Linda Benfield – Attorney for MASD	Foley and Lardner, LLP
Brian Kennedy – Environmental Engineer	U.S. EPA
Jamie Paulin – Chemist	U.S. EPA
Alexandra Letuchy – Environmental Engineer	U.S. EPA
Manojkumar Patel – Environmental Engineer	U.S. EPA

Pre-Site Visit

Prior to the sampling event, EPA inspectors completed a Health and Safety Plan (HASP), a Sampling Analysis Plan (SAP), and a Quality Assurance Project Plan (QAPP). An *ex parte* administrative warrant from the United States District Court for the Eastern District of Wisconsin was procured on May 2, 2017.

Introduction

EPA inspectors Paulin, Letuchy, Patel and myself arrived on site at approximately 10:00 AM CST. There was a strong chemical odor on the public roads surrounding the facility upon arrival. Entering the front office, we presented the administrative warrant to Ms. Tiffany Hupp, MASD's Office Manager. We explained the purpose of the warrant and our site visit, and that we intended to sample at the facility that day. We also explained the administrative warrant allowed for immediate access to the facility. Ms. Hupp claimed she needed to make several calls before allowing us on site. We expressed our disagreement with this decision.

While waiting for permission to enter the site, Inspector Paulin took photos of the north side of the facility from the sidewalk on South Pennsylvania Avenue (See Attachment A: Photos 1 and 2). Semi-trailers were observed parked along a north-side loading dock.

Mid-America Steel Drum, Inc.
WIR 000 131 367
May 4, 2017

After several minutes of delay, I called Mr. Michael Carter, Assistant United States Attorney for the Eastern District of Wisconsin, to explain that we were not allowed immediate access to the site after presenting the warrant. Mr. Carter was eventually put in contact by phone with Ms. Linda Benfield, MASD's Attorney of Foley and Lardner, LLP, to discuss the situation. After several minutes of discussion, Ms. Hupp stated that we could enter the facility. At 10:25 AM, Mr. Mark Furgason, MASD's Plant Manager, arrived to the front office and escorted us on site.

Initial Site Tour

EPA inspectors Paulin, Letuchy, Patel and myself were first directed by Mr. Furgason to MASD's outdoor loading and "heavies" dock on the north side of the facility. Here, MASD employees unload incoming 55-gallon drums for sorting and processing (Photographs 3 – 6). The only drums handled here are steel closed-top drums. We observed MASD employees shake and "feel" the 55-gallon drums to determine if they contained any material. Those drums determined to contain little to no material were rolled to the nearby conveyor line, which led inside the facility for processing. Inspector Paulin and I examined several of the numerous drums on the outdoor portion of the conveyor line, and those about to be placed on the conveyor. The drums we examined to did not appear to contain material.

For those drums determined to contain material, MASD employees place them on the east side of the loading dock in the "heavies" area. These rejected drums are referred to as "heavies." We observed approximately 103 heavy drums stored in this area (Photographs 7 – 10). The drums were packed together closely and it was difficult to examine drum labels or tags. MASD placed yellow tags on the heavy drums with numbers that denote the customer that sent the drum (Photograph 11). Some, but not all, of the yellow tags were marked with the date of arrival of the drum to MASD. Dates from April 2017 were observed on those drums that were dated. Inspector Paulin and I selected and marked seven heavy drums from this area to be sampled (Photograph 12). The drums were selected, in part, because of labeling indicative of hazardous materials.

At this time, Mr. Furgason and Inspectors Patel and Letuchy proceeded inside the facility. Inspectors Patel and Letuchy later departed MASD in the early afternoon. Mr. Robert Janowski, MASD's Plant Engineer, joined Inspector Paulin and I on the heavies dock.

After selecting and marking the seven heavy drums for sampling, Mr. Janowski led Inspector Paulin and I inside the facility through a north-side entrance near the heavies storage area. Upon entrance, the chemical odor noted outside the facility intensified. We observed a standing fog or haze inside the facility (Photographs 13 – 14). It was unclear from where the fog was originating. Mr. Janowski led us through MASD's poly (plastic) drum loading areas along the east side of the facility. Here, MASD employees also "feel" incoming poly drums to determine if they are heavy. I examined approximately four of the numerous poly drums placed on the conveyor line leading to processing. The drums I examined did not appear to contain material.

At the southeast corner of the facility we observed a hazardous waste storage area. There were 13 55-gallon drums and two 5-gallon containers marked as hazardous waste and dated. We also observed five open buckets in the area that were covered in plastic and did not appear labeled (Photographs 15 – 19). The 55-gallon drums in the area had markings on their lids which stated "Mercury Wash Water." All hazardous waste labels in the area were marked as D009 hazardous

Mid-America Steel Drum, Inc.
WIR 000 131 367
May 4, 2017

waste for mercury content. We asked Mr. Janowski the source of this waste. He stated that SET Environmental was hired to come to the facility on weekends to perform cleaning of MASD equipment, and that this waste was generated during the cleaning event(s). Mr. Janowski could not provide further information on the source of the mercury.

The tour continued west along the south side of the facility. We observed four large cardboard boxes across from MASD's wastewater treatment area that were labeled as hazardous waste for mercury (Photographs 20 – 21). Mr. Janowski was unsure of the source of the waste, but stated it might be filter cake from wastewater treatment operations. Adjacent to these four boxes were four 55-gallon drums that were labeled as hazardous waste for mercury (Photograph 22). One 55-gallon drum near these four hazardous waste drums had its lid marked as "Boots" (partially visible in Photograph 22). Mr. Janowski stated this drum contained the boots of MASD employees that were contaminated with mercury. This drum did not have a hazardous waste label. Another 55-gallon drum near the four hazardous waste drums was not labeled and was covered with tape (Photograph 23). Mr. Janowski stated the drum contained mercury waste. The drum was not labeled as hazardous waste.

Continuing west along the south side of the facility, near the wastewater treatment area, we observed four 55-gallon drums that were labeled as non-hazardous waste (Photographs 24 – 25). Mr. Janowski stated this waste was material that had accumulated along the bottom of machinery in MASD's process line. Two of these drums were marked to be sampled.

Mr. Janowski briefly directed us through MASD's steel drum processing line, which is on a raised steel catwalk above the ground level. Along the north side of the facility, MASD blasts cleaned drums with steel shot as part of the reconditioning process. Shot blast dust from a dust collector is accumulated in 55-gallon drums and shipped off-site as a non-hazardous waste. MASD stages 55-gallons of this dust for shipment near the center of its steel drum processing line. We observed at least a dozen of these drums in the area. One of these drums was marked to be sampled.

Around this time, Ms. Linda Benfield, MASD's Attorney, arrived on site and joined the tour. Ms. Benfield requested that split samples be taken for all samples. MASD provided its own jars to collect split samples.

Inspector Paulin and I returned to our vehicle to ready sampling equipment and don protective gear. The pre-marked drums on the heavies dock were sampled first, and staging was completed for each drum prior to sampling (Photograph 26). Sampling was then conducted on those pre-marked drums near the wastewater treatment area inside the south end of the facility, and then on the pre-marked drum in the shot blast dust storage area in the center of the facility.

Mr. Janowski and Ms. Benfield were present for the duration of sampling activities.

Sampling – Heavies Dock

All drums on the heavies dock were sampled using the following equipment: Glass Coliwasa samplers, pH paper, a ruler, 16 oz. glass jars, drums covers, a bung wrench, and a Multi-Rae. A split sample for MASD was taken for each sample.

The following table summarizes the notes and observations made during the sampling conducted on the heavies dock:

Sample No.	Time Taken (CST)	Depth of Waste in Container	Approx. pH	Additional Observations	Photo Numbers
SFS01	1:06 PM	2 inches	1	Black poly drum marked "Sulfuric Acid." Four aliquots per sample jar. Limited sample material available.	27 – 31
SFS02	1:20 PM	3 inches	8	Blue poly drum with corrosive and flammable markers. Four aliquots per sample jar. Limited sample material available.	32 – 36
SFS03	1:31 PM	2.5 inches	6	Blue poly drum marked as MDG ZymoBac GTLS 10x. Four aliquots per sample jar. Limited sample material available.	37 – 40
SFS04	1:39 PM	2 inches	6	Blue steel drum marked "Toluene." Multi-Rae hit 300 ppm VOCs. Four aliquots per sample jar. Limited sample material available.	41 – 44
SFS05	N/A	N/A	1	Black poly drum marked "Muriatic Acid." When bung opened, vigorous fume/smoke exited. Fumes turned pH paper bright red. Decided not to sample as a precaution.	45 – 48
SFS06	1:55 PM	3.2 inches	1	Black poly drum marked "Muriatic Acid." Four aliquots per sample jar. Limited sample material available.	49 – 52
SFS07	2:03 PM	2.75 inches	6	Green steel drum marked "EtOH / Triethyl Citrate Kosher" and flammable. Four aliquots per sample jar. Limited sample material available.	53 – 55

Sampling – Near Wastewater Treatment Area

Two drums in this area were sampled using the following equipment: Glass Coliwasa samplers, pH paper, 16 oz. glass jars, and a Multi-Rae. A split sample for MASD was taken for each sample. Mr. Janowski opened these drums at our request.

The following table summarizes the notes and observations made during the sampling conducted in this area:

Sample No.	Time Taken (CST)	Approx. pH	Additional Observations	Photo Number
SFS08	3:10 PM	10	Black steel open-top drum marked as “Non-Hazardous Waste.” Material was brown in color with a sludgy consistency. Liquid had separated to form a thin top layer. Drum was almost full. Two full 16 oz. jars taken.	56 – 59
SFS09	3:23 PM	10	Black steel open-top drum marked as “Non-Hazardous Waste.” Material was brown in color with a sludgy consistency. Liquid had separated to form a thin top layer. Drum was almost full. Two full 16 oz. jars taken.	60 – 62

Sampling – Shot Blast Dust Storage Area

One drum in this area were sampled using the following equipment: Plastic scoops and 16 oz. glass jars. A split sample for MASD was taken. Mr. Janowski opened this drum at our request.

Sample No.	Time Taken (CST)	Additional Observations	Photo Number
SFS10	3:37 PM	Red steel open-top drum with no clear marking or label Material was a very fine gray dust. Drum was almost full. Two full 16 oz. jars taken with three scoops per jar	63 – 64
SFS10 Dup	3:37 PM	Red steel open-top drum with no clear marking or label Material was a very fine gray dust. Drum was almost full. Two full 16 oz. jars taken with three scoops per jar.	63 – 64

Sampling Completion

After sampling was completed, Inspector Paulin and I proceeded to bag and tag the samples. We prepared a chain of custody form for the samples in addition to a sample receipt for MASD. Mr. Furgason signed the sample receipt and copies of both documents were left with MASD. A copy of the receipt for samples and chain of custody form is in Attachment B.

Inspector Paulin and I left the facility at approximately 5:30 PM.

NOTE: When available, sample results will be placed in Attachment C.

Mid-America Steel Drum, Inc.
WIR 000 131 367
May 4, 2017

Attachments

- A. Photographs
- B. Sample Receipt and Chain of Custody
- C. Sample Results (Pending)

Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 1
Photo Filename DSCN1061.JPG
Date/Time 5/4/2017
10:23:00 AM
Photographer Jamie Paulin

Description

Northside dock. View from Pennsylvania Avenue. Trucks were parked at the dock where 55-gallon containers were being off-loaded.



Disk Number 1
Photo Number 2
Photo Filename DSCN1062.JPG
Date/Time 5/4/2017
10:23:00 AM
Photographer Jamie Paulin

Description

Northside dock. View from Pennsylvania Avenue. Trucks were parked at the dock where 55-gallon containers were being off-loaded.



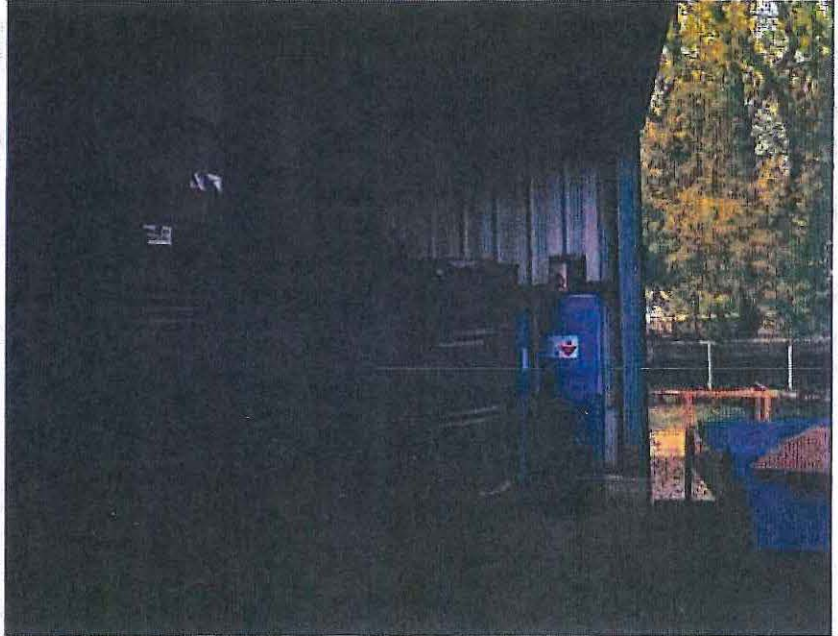
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 3
Photo Filename DSCN1063.JPG
Date/Time 5/4/2017
10:38:00 AM
Photographer Jamie Paulin

Description

Northside Dock. Stacks of empty 55-gallon containers were being stored in this location.



Disk Number 1
Photo Number 4
Photo Filename DSCN1064.JPG
Date/Time 5/4/2017
10:39:00 AM
Photographer Jamie Paulin

Description

Northside Dock. Stacks of empty 55-gallon containers were being stored in this location. Some had been washed but were being rejected.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 5
Photo Filename DSCN1065.JPG
Date/Time 5/4/2017
10:40:00 AM
Photographer Jamie Paulin

Description

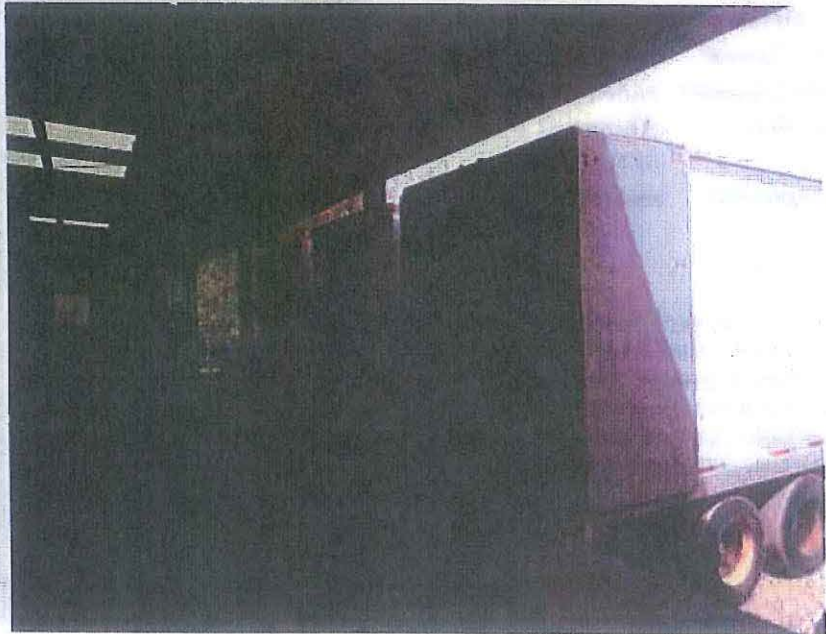
Northside dock - storage prior to conveyor belt. Several metal 55-gallon containers were being off-loaded at the time of the sampling event. These metal drums felt empty and appeared to be empty.



Disk Number 1
Photo Number 6
Photo Filename DSCN1066.JPG
Date/Time 5/4/2017
10:41:00 AM
Photographer Jamie Paulin

Description

Northside dock. Several trailers of 55-gallon containers were being off-loaded at the time of the sampling event.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 7
Photo Filename DSCN1067.JPG
Date/Time 5/4/2017
10:41:00 AM
Photographer Jamie Paulin

Description

Storage of "heavies." About 103 x 55-gallon containers were being stored in this location awaiting removal from customers. There was no aisle space and it was difficult to read the assigned tag numbers. Each customer received a number assigned per drum.



Disk Number 1
Photo Number 8
Photo Filename DSCN1068.JPG
Date/Time 5/4/2017
10:41:00 AM
Photographer Jamie Paulin

Description

Storage of "heavies." About 103 x 55-gallon containers were being stored here awaiting removal from customers. There was no aisle space and it was difficult to read the assigned tag numbers. Each customer received a number assigned per drum - yellow tag.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 9
Photo Filename DSCN1069.JPG
Date/Time 5/4/2017
10:41:00 AM
Photographer Jamie Paulin

Description

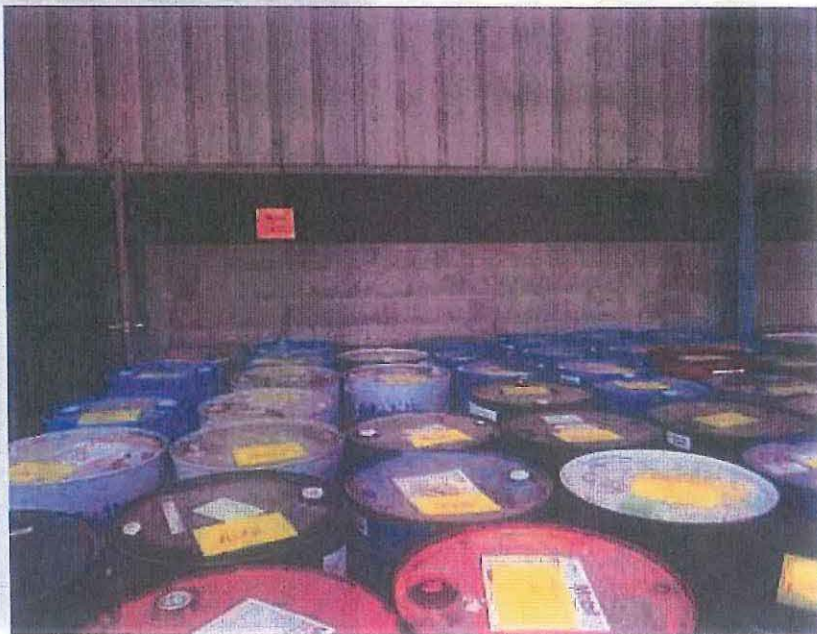
Storage of "heavies." About 103 x 55-gallon containers were being stored here awaiting removal from customers. There was no aisle space and it was difficult to read the assigned tag numbers. Each customer received a number assigned per drum - yellow tag.



Disk Number 1
Photo Number 10
Photo Filename DSCN1070.JPG
Date/Time 5/4/2017
10:43:00 AM
Photographer Jamie Paulin

Description

Storage of "heavies." About 103 x 55-gallon containers were being stored here awaiting removal from customers. There was no aisle space and it was difficult to read the assigned tag numbers. Each customer received a number assigned per drum - yellow tag.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 11
Photo Filename DSCN1071.JPG
Date/Time 5/4/2017
10:45:00 AM
Photographer Jamie Paulin

Description

Storage of "heavies." Each 55-gallon container was assigned a tag number placed on top of each drum associated with a customer. One of the drums per tag number was dated. This tag was dated 4/28/17.



Disk Number 1
Photo Number 12
Photo Filename DSCN1072.JPG
Date/Time 5/4/2017
10:59:00 AM
Photographer Jamie Paulin

Description

Storage of "heavies." Seven 55-gallon containers were selected from the "heavies" storage area to sample, based on hazardous material labeling. The drums were not labeled as hazardous waste nor did they contain a date. 1 did not contain a tag number label



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 13
Photo Filename DSCN1073.JPG
Date/Time 5/4/2017
11:08:00 AM
Photographer Jamie Paulin

Description

Poly drum process area. Stacks of empty poly 55-gallon containers were being loaded onto the conveyor belt for processing. The air was foggy and misty. There was a strong odor inside the facility.



Disk Number 1
Photo Number 14
Photo Filename DSCN1074.JPG
Date/Time 5/4/2017
11:08:00 AM
Photographer Jamie Paulin

Description

Poly drum process area. Stacks of empty poly 55-gallon containers were being loaded onto the conveyor belt for processing. The air was foggy and misty. There was a strong odor inside the facility.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 15
Photo Filename DSCN1075.JPG
Date/Time 5/4/2017
11:16:00 AM
Photographer Jamie Paulin

Description

Hazardous waste storage area. Waste that had been collected by cleaning off of and under equipment was stored in 5 open buckets tied in a plastic bag with no lids, labels or dates.



Disk Number 1
Photo Number 16
Photo Filename DSCN1076.JPG
Date/Time 5/4/2017
11:16:00 AM
Photographer Jamie Paulin

Description

Hazardous waste storage area. Waste that had been collected by cleaning off of and under equipment was stored in 5 open buckets. The buckets were tied in a plastic bag with no lids, labels or dates.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 17
Photo Filename DSCN1077.JPG
Date/Time 5/4/2017
11:18:00 AM
Photographer Jamie Paulin

Description

Hazardous waste storage area. 13 x 55-gallon containers and 2 x 5-gallon containers were labeled as hazardous waste and were being stored in this area. SET cleaned the equipment over the previous weekend and stored the hazardous waste in this area.



Disk Number 1
Photo Number 18
Photo Filename DSCN1078.JPG
Date/Time 5/4/2017
11:18:00 AM
Photographer Jamie Paulin

Description

Hazardous waste storage area. 13 x 55-gallon containers and 2 x 5-gallon containers were labeled as hazardous waste and were being stored in this area. SET cleaned the equipment over the previous weekend and stored the hazardous waste in this area.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 19
Photo Filename DSCN1079.JPG
Date/Time 5/4/2017
11:21:00 AM
Photographer Jamie Paulin

Description

Hazardous waste storage area. 13 x 55-gallon containers and 2 x 5-gallon containers were labeled as hazardous waste and were being stored in this area. SET cleaned the equipment over the previous weekend and stored the hazardous waste in this area.



Disk Number 1
Photo Number 20
Photo Filename DSCN1080.JPG
Date/Time 5/4/2017
11:24:00 AM
Photographer Jamie Paulin

Description

Conveyor belt located across from waste water treatment unit (WWTU) area, 4 cardboard totes were being stored with hazardous waste labels. Robert Janowski did not know the source of the waste. He stated that it might be WWTU filter cake.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 21
Photo Filename DSCN1081.JPG
Date/Time 5/4/2017
11:24:00 AM
Photographer Jamie Paulin

Description

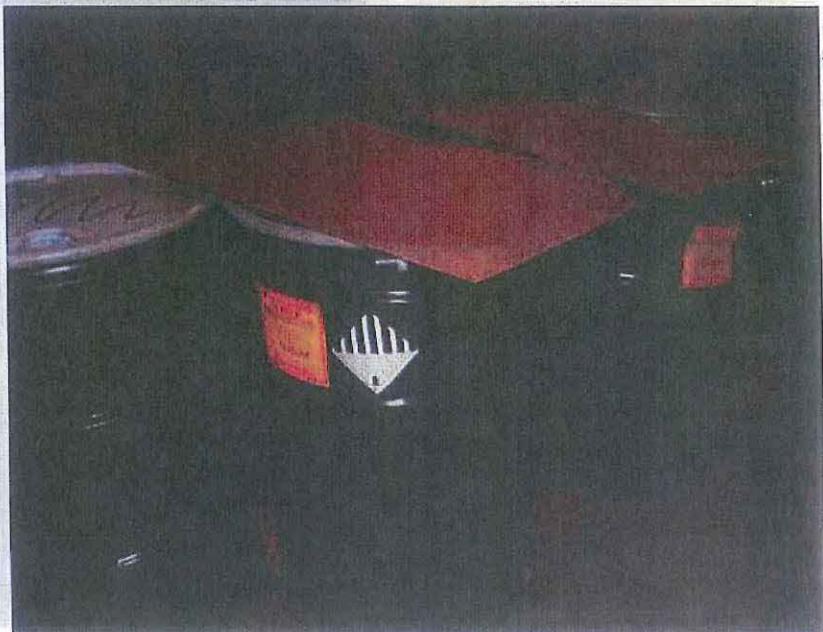
Conveyor belt located across from waste water treatment unit (WWTU) area. 4 cardboard totes were being stored with hazardous waste labels. Robert Janowski did not know the source of the waste. He stated that it might be WWTU filter cake.



Disk Number 1
Photo Number 22
Photo Filename DSCN1082.JPG
Date/Time 5/4/2017
11:25:00 AM
Photographer Jamie Paulin

Description

Near the process area and WWTU. 4 x 55-gallon containers were labeled as hazardous waste for mercury contamination. One 55-gallon container was storing mercury contaminated boots; however did not contain a hazardous waste label.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 23
Photo Filename DSCN1083.JPG
Date/Time 5/4/2017
11:26:00 AM
Photographer Jamie Paulin

Description

Near the process area and WWTU. One 55-gallon container was being stored without labeling and sealed with tape rather than with a lid. Robert Janowski stated that the container was storing mercury contaminated waste.



Disk Number 1
Photo Number 24
Photo Filename DSCN1084.JPG
Date/Time 5/4/2017
11:28:00 AM
Photographer Jamie Paulin

Description

Near the process area and WWTU. Four x 55-gallon containers were being stored as non-hazardous waste. Robert Janowski stated that the waste was collected from the bottom of machinery. The drum we labeled as "H" was sampled.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 25
Photo Filename DSCN1085.JPG
Date/Time 5/4/2017
11:30:00 AM
Photographer Jamie Paulin

Description

Near the process area and WWTU. Six x 55-gallon containers were being stored as non-hazardous waste. Robert Janowski stated that the waste was collected from the bottom of machinery. The drum we labeled as "1" was sampled.



Disk Number 1
Photo Number 26
Photo Filename DSCN1086.JPG
Date/Time 5/4/2017
12:57:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." Seven 55-gallon containers were staged and prepared to be sampled with coliwassas.



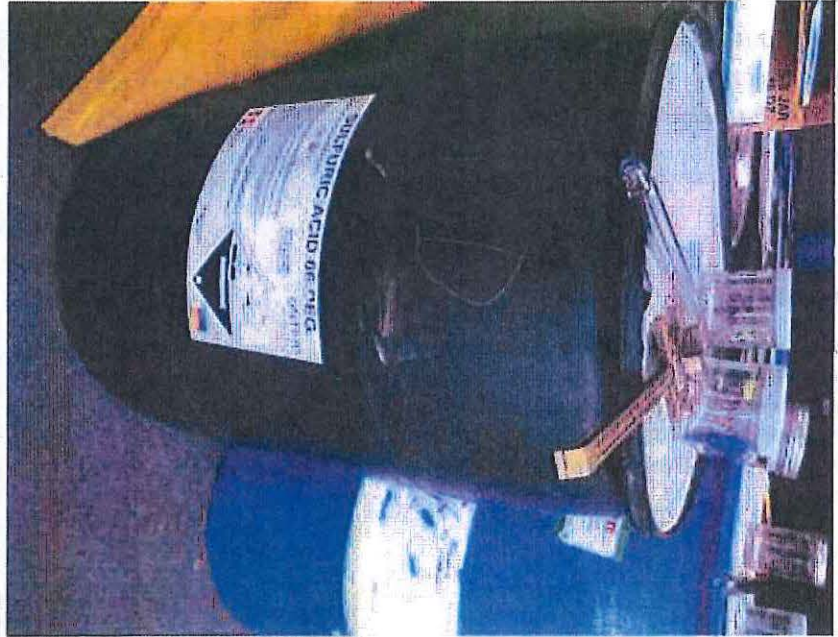
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 27
Photo Filename DSCN1087.JPG
Date/Time 5/4/2017
12:58:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as sulfuric acid. SFS01. Sampled 1:06pm. Level of contents was 2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 28
Photo Filename DSCN1088.JPG
Date/Time 5/4/2017
1:06:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as sulfuric acid. SFS01. Sampled 1:06pm. Level of contents was 2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 29
Photo Filename DSCN1089.JPG
Date/Time 5/4/2017
1:08:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as sulfuric acid, SFS01. Sampled 1:06pm. Level of contents was 2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 30
Photo Filename DSCN1090.JPG
Date/Time 5/4/2017
1:14:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as sulfuric acid, SFS01. Sampled 1:06pm. Level of contents was 2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 31
Photo Filename DSCN1091.JPG
Date/Time 5/4/2017
1:14:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as sulfuric acid. SFS01. Sampled 1:06pm. Level of contents was 2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 32
Photo Filename DSCN1092.JPG
Date/Time 5/4/2017
1:18:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as corrosive & flammable. SFS02. Sampled 1:20pm. Level of contents was 3 inches. pH paper showed pH of 8. 4 aliquots each sample jar. Split taken.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 33
Photo Filename DSCN1093.JPG
Date/Time 5/4/2017
1:20:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as corrosive & flammable. SFS02. Sampled 1:20pm. Level of contents was 3 inches. pH paper showed pH of 8. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 34
Photo Filename DSCN1094.JPG
Date/Time 5/4/2017
1:20:00 PM
Photographer Jamie Paulin

Description

Photograph of working area.



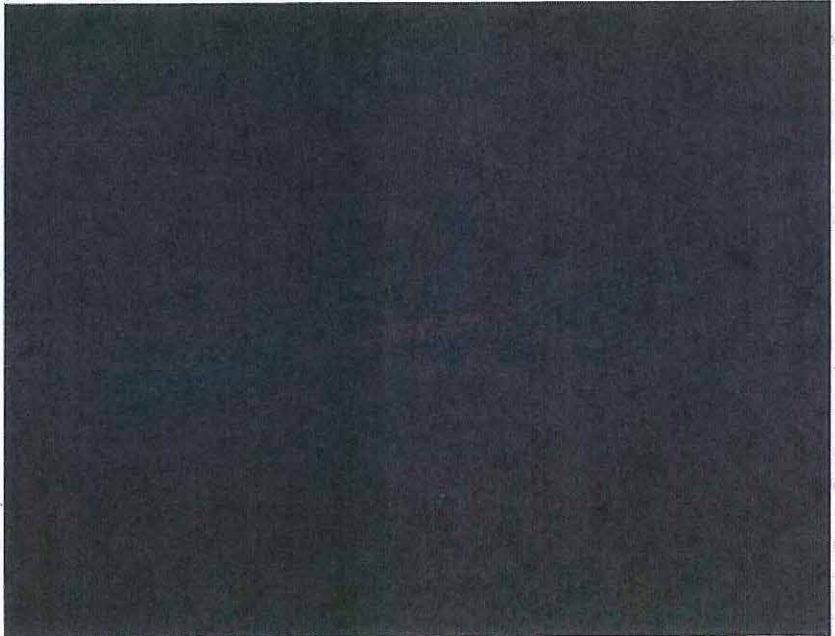
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 35
Photo Filename DSCN1095.JPG
Date/Time 5/4/2017
1:21:00 PM
Photographer Jamie Paulin

Description

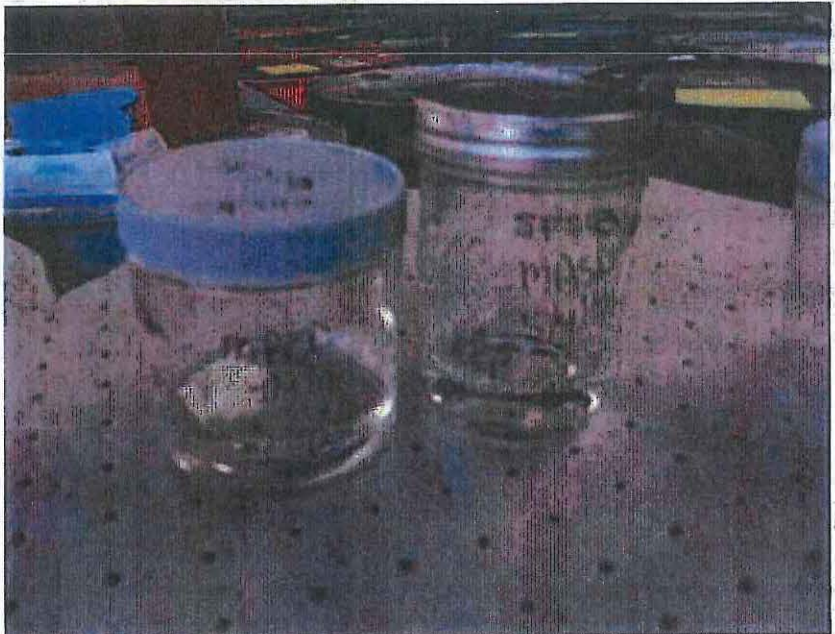
Storage of "heavies." One 55-gallon container was labeled as corrosive & flammable. SFS02. Sampled 1:20pm. Level of contents was 3 inches. pH paper showed pH of 8. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 36
Photo Filename DSCN1096.JPG
Date/Time 5/4/2017
1:26:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as corrosive & flammable. SFS02. Sampled 1:20pm. Level of contents was 3 inches. pH paper showed pH of 8. 4 aliquots each sample jar. Split taken.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 37
Photo Filename DSCN1097.JPG
Date/Time 5/4/2017
1:30:00 PM
Photographer Jamie Paulin

Description

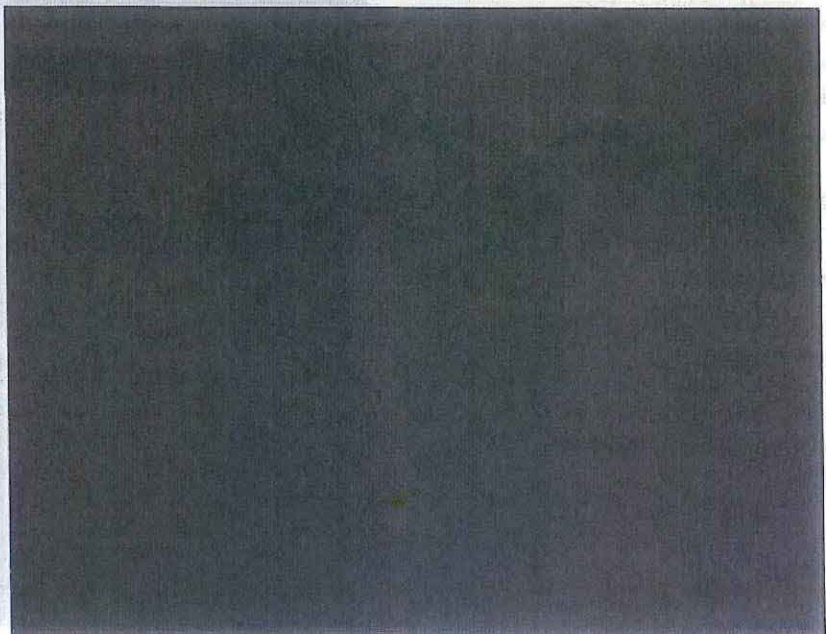
Storage of "heavies." One 55-gallon container was labeled as MDG ZymoBac GTLS 10x. SFS03. Sampled 1:31pm. Level of contents was 2.5 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 38
Photo Filename DSCN1098.JPG
Date/Time 5/4/2017
1:34:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as MDG ZymoBac GTLS 10x. SFS03. Sampled 1:31pm. Level of contents was 2.5 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.



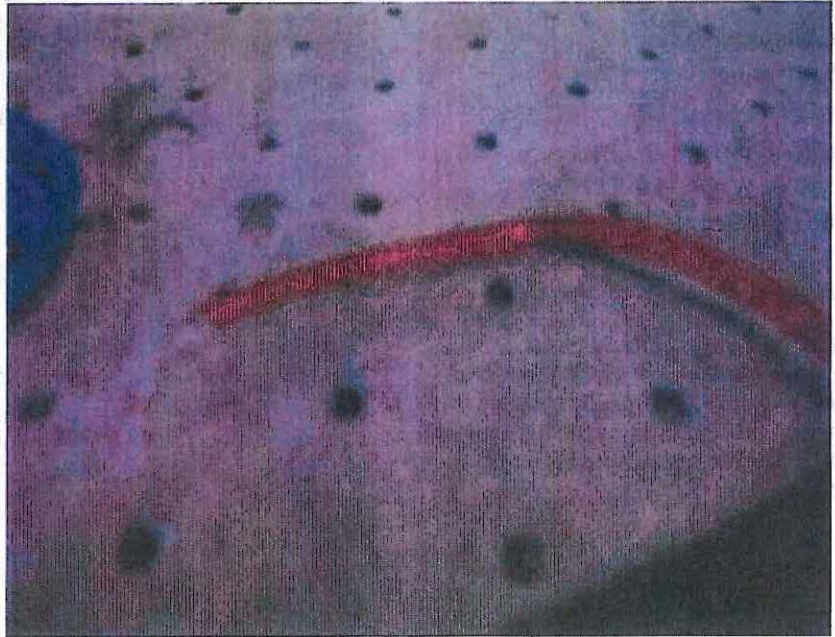
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 39
Photo Filename DSCN1099.JPG
Date/Time 5/4/2017
1:35:00 PM
Photographer Jamie Paulin

Description

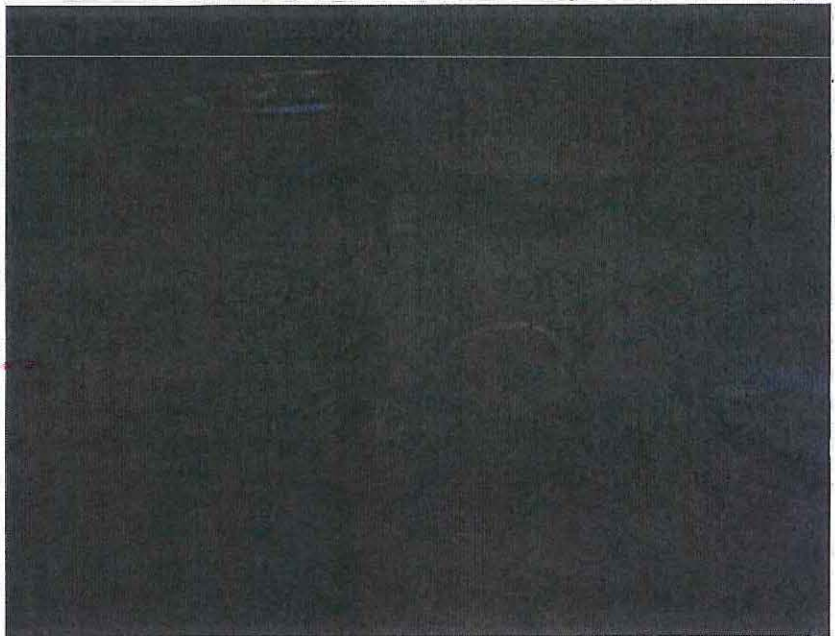
Storage of "heavies." One 55-gallon container was labeled as MDG ZymoBac GTLS 10x. SFS03. Sampled 1:31pm. Level of contents was 2.5 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 40
Photo Filename DSCN1100.JPG
Date/Time 5/4/2017
1:38:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as MDG ZymoBac GTLS 10x. SFS03. Sampled 1:31pm. Level of contents was 2.5 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 41
Photo Filename DSCN1101.JPG
Date/Time 5/4/2017
1:40:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Toluene. SFS04. Sampled 1:39pm. Level of contents was 2 inches. pH paper showed pH of 6. 4 aliquots each sample jar. 300ppm VOCs on multi-rae. Split taken.



Disk Number 1
Photo Number 42
Photo Filename DSCN1102.JPG
Date/Time 5/4/2017
1:42:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Toluene. SFS04. Sampled 1:39pm. Level of contents was 2 inches. pH paper showed pH of 6. 4 aliquots each sample jar. 300ppm VOCs on multi-rae. Split taken.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 43
Photo Filename DSCN1103.JPG
Date/Time 5/4/2017
1:43:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Toluene. SFS04. Sampled 1:39pm. Level of contents was 2 inches. pH paper showed pH of 6. 4 aliquots each sample jar. 300ppm VOCs on multi-rae. Split taken.



Disk Number 1
Photo Number 44
Photo Filename DSCN1104.JPG
Date/Time 5/4/2017
1:47:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Toluene. SFS04. Sampled 1:39pm. Level of contents was 2 inches. pH paper showed pH of 6. 4 aliquots each sample jar. 300ppm VOCs on multi-rae. Split taken.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 45
Photo Filename DSCN1105.JPG
Date/Time 5/4/2017
1:48:00 PM
Photographer Jamie Paulin

Description

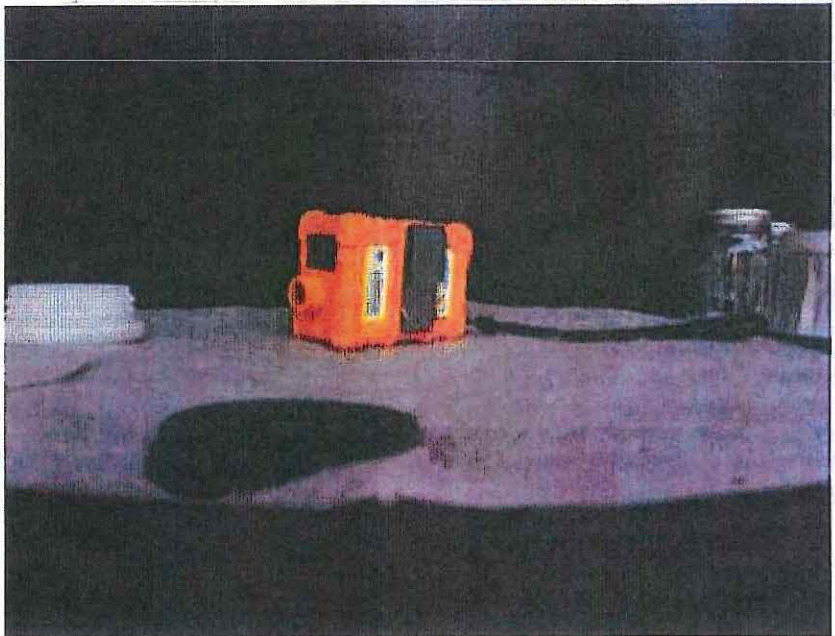
Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid. SFS05. Tried to sample at 1:46pm. When drum was opened, the drum began to fume/smoke. We did not take a sample for safety purposes. The fumes turned the pH paper red, pH of 1.



Disk Number 1
Photo Number 46
Photo Filename DSCN1106.JPG
Date/Time 5/4/2017
1:51:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid. SFS05. Tried to sample at 1:46pm. When drum was opened, the drum began to fume/smoke. We did not take a sample for safety purposes. The fumes turned the pH paper red, pH of 1.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 47
Photo Filename DSCN1107.JPG
Date/Time 5/4/2017
1:51:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid. SFS05. Tried to sample at 1:46pm. When drum was opened, the drum began to fume/smoke. We did not take a sample for safety purposes. The fumes turned the pH paper red, pH of 1.



Disk Number 1
Photo Number 48
Photo Filename DSCN1108.JPG
Date/Time 5/4/2017
1:52:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid. SFS05. Tried to sample at 1:46pm. When drum was opened, the drum began to fume/smoke. We did not take a sample for safety purposes. The fumes turned the pH paper red, pH of 1.



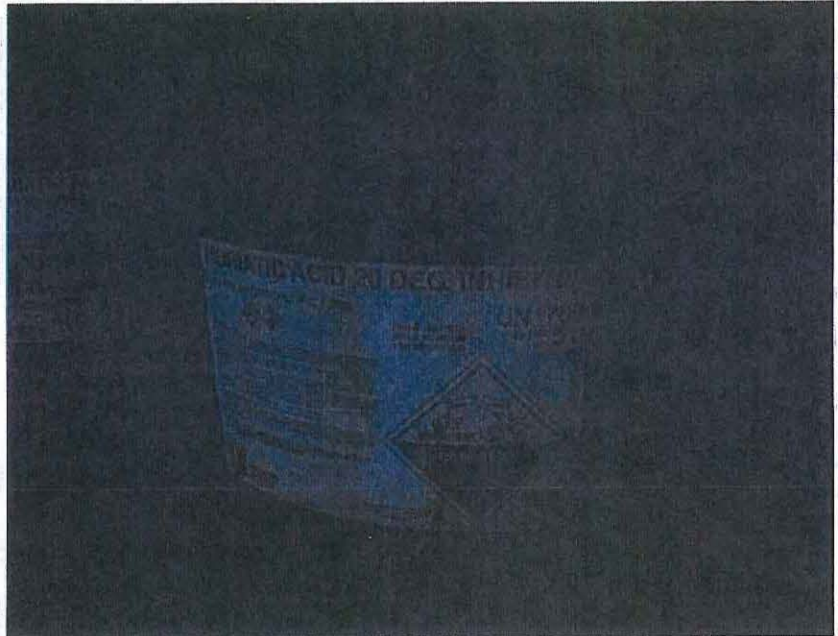
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 49
Photo Filename DSCN1109.JPG
Date/Time 5/4/2017
1:55:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid 20 DEG. SFS06. Sampled 1:55pm. Level of contents was 3.2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 50
Photo Filename DSCN1110.JPG
Date/Time 5/4/2017
1:58:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid 20 DEG. SFS06. Sampled 1:55pm. Level of contents was 3.2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 51
Photo Filename DSCN1111.JPG
Date/Time 5/4/2017
1:58:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid 20 DEG. SFS06. Sampled 1:55pm. Level of contents was 3.2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 52
Photo Filename DSCN1112.JPG
Date/Time 5/4/2017
2:03:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid 20 DEG. SFS06. Sampled 1:55pm. Level of contents was 3.2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



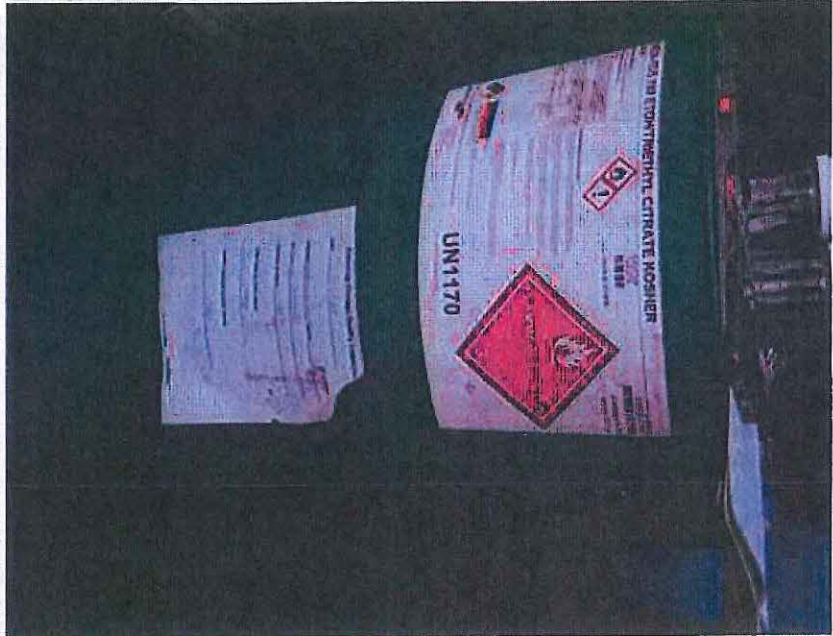
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 53
Photo Filename DSCN1113.JPG
Date/Time 5/4/2017
2:04:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as ETOH/Triethyl Citrate Kosher. SFS07. Sampled 2:03pm. Level of contents was 2.75 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 54
Photo Filename DSCN1114.JPG
Date/Time 5/4/2017
2:07:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as ETOH/Triethyl Citrate Kosher. SFS07. Sampled 2:03pm. Level of contents was 2.75 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 55
Photo Filename DSCN1115.JPG
Date/Time 5/4/2017
2:11:00 PM
Photographer Jamie Paulin

Description

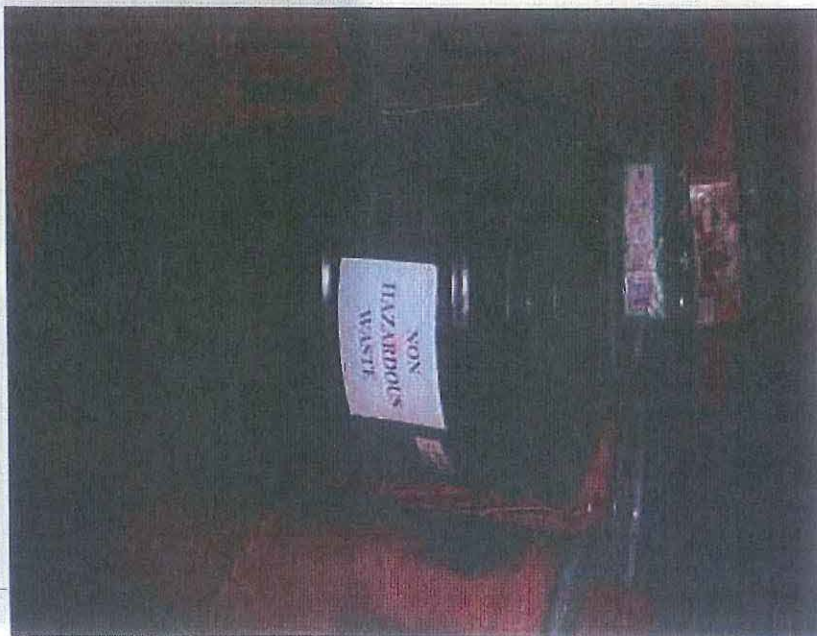
Storage of "heavies." One 55-gallon container was labeled as ETOH/Triethyl Citrate Kosher. SFS07. Sampled 2:03pm. Level of contents was 2.75 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 56
Photo Filename DSCN1116.JPG
Date/Time 5/4/2017
2:56:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS08. Sampled 3:10pm. Full contents. pH paper showed pH of 10. 8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.



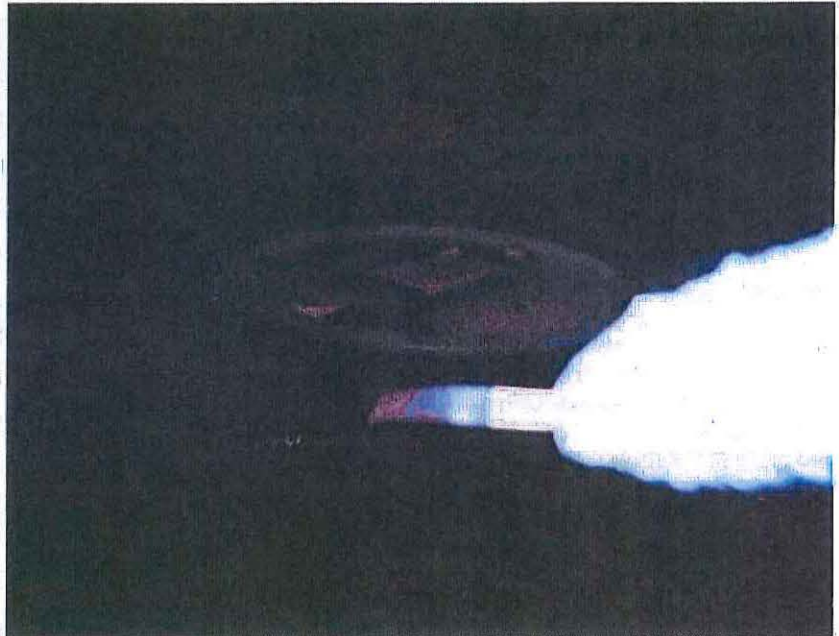
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 57
Photo Filename DSCN1117.JPG
Date/Time 5/4/2017
3:01:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS08. Sampled 3:10pm. Full contents. pH paper showed pH of 10. 8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.



Disk Number 1
Photo Number 58
Photo Filename DSCN1118.JPG
Date/Time 5/4/2017
3:17:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS08. Sampled 3:10pm. Full contents. pH paper showed pH of 10. 8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.



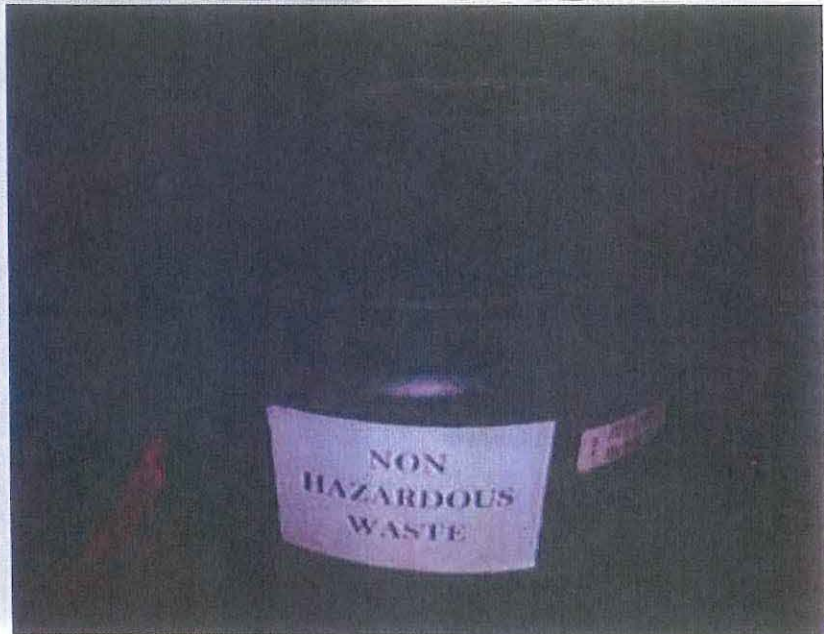
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 59
Photo Filename DSCN1119.JPG
Date/Time 5/4/2017
3:17:00 PM
Photographer Jamie Paulin

Description

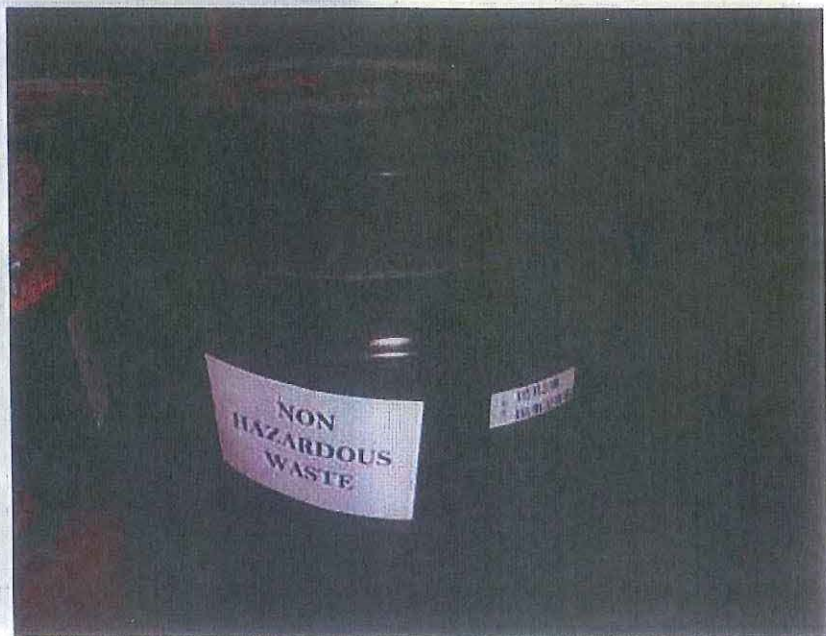
Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS09. Sampled 3:23pm. Full contents. pH paper showed pH of 10.8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.



Disk Number 1
Photo Number 60
Photo Filename DSCN1120.JPG
Date/Time 5/4/2017
3:19:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS09. Sampled 3:23pm. Full contents. pH paper showed pH of 10.8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 61
Photo Filename DSCN1121.JPG
Date/Time 5/4/2017
3:23:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS09. Sampled 3:23pm. Full contents. pH paper showed pH of 10. 8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.



Disk Number 1
Photo Number 62
Photo Filename DSCN1122.JPG
Date/Time 5/4/2017
3:31:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS09. Sampled 3:23pm. Full contents. pH paper showed pH of 10. 8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.



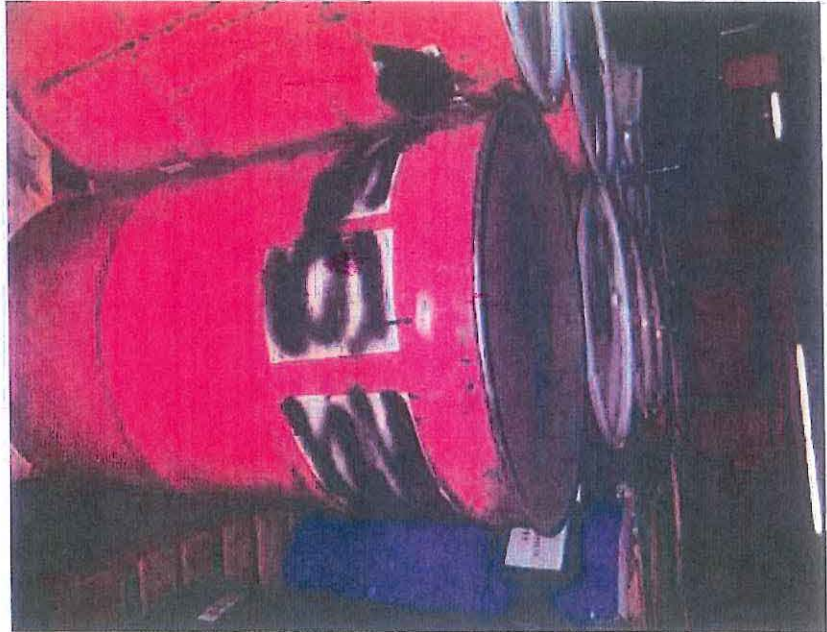
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 63
Photo Filename DSCN1123.JPG
Date/Time 5/4/2017
3:37:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS10. Sampled 3:37pm. Full contents. 3 scoops each sample jar. 4 x 16 oz sample jars were filled. Split taken. Duplicate taken.



Disk Number 1
Photo Number 64
Photo Filename DSCN1124.JPG
Date/Time 5/4/2017
3:43:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS10. Sampled 3:37pm. Full contents. 3 scoops each sample jar. 4 x 16 oz sample jars were filled. Split taken. Duplicate taken.

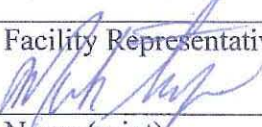
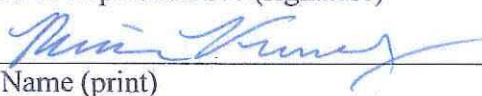






U.S. Environmental Protection Agency
Region 5

RECEIPT FOR SAMPLES

Name of Facility <i>Mid-America Steel Drum St. Francis, WI</i>		Project Number <i>MASD-05-04-17</i>	
Facility Location <i>3950 S. Pennsylvania Ave. St. Francis, WI 53235</i>			
DESCRIPTION			
<i>Six drum heavies - Flash point + pH</i>			
<i>Two drum sludges - Flash point, pH, TCLP Metals, near WWTV TCLP Hg, TCLP VOCs, TCLP SVOCs</i>			
<i>One drum dust - Flash point, pH, TCLP Metals, TCLP Hg, TCLP VOCs, TCLP SVOCs</i>			
Facility Representative (signature) 		EPA Representative (signature) 	
Name (print) <i>Mark Furber</i>		Name (print) <i>Brian Kennedy</i>	
Title <i>SPTS MANAGER</i>	Date Signed <i>5-4-17</i>	Title <i>RCRA Enf. Officer</i>	Date Signed <i>5/4/17</i>

Distribution: Original to Facility Representative; Copy to Project File

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

Sampling Report

Date of Sampling Event: May 4, 2017

Facility Name: Container Life Cycle Management, LLC
d/b/a 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: Kevin Meyer
Plant Manager

EPA Contact: Brenda Whitney - Environmental Engineer
RCRA Branch
Compliance Section 2
Land and Chemicals Division

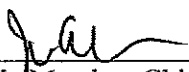
Prepared By:


Brenda Whitney - Environmental Engineer

7-5-17

Date

Approved By:


Julie Morris - Chief, Compliance Section 2

7/6/17
Date

Purpose of the Sampling Event

An unannounced Sampling Event at Mid-America Steel Drum ("MASD-OC") located at 8570 Chicago Road, in Oak Creek, Wisconsin, took place on May 4, 2017. MASD-OC has notified as a small quantity generator (SQG) of hazardous waste. Graciela Scambiatterra accompanied me during this event. In addition to facility representatives, attorneys from the Foley & Lardner LLP ("F&L") were present during the event.

The Sampling Event was conducted at three MASD facilities in the Milwaukee area simultaneously in order to obtain analytical data to supplement an evaluation of MASD's compliance at these three facilities with the appropriate hazardous waste regulations codified at the authorized Wisconsin Administrative Code and the Code of Federal Regulations. This report is a record of the MASD-OC facility sampling event only. Reports for the other two facilities are written under separate cover.

Participants

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

Chris Mosely – Maintenance Engineer	MASD-OC
David Lowry – Assistant Plant Manager	MASD-OC
Kevin Meyer – Plant Manager	MASD-OC
Sherry Kannenberg – Receptionist	MASD-OC
Mike Flanagan – Attorney	F&L
Sarah Slack – Attorney	F&L
Graciela Scambiatterra – Environmental Scientist	EPA
Brenda Whitney – Environmental Engineer	EPA

Introduction

The sampling event was conducted simultaneously at three MASD facilities, as the next logical step in an on-going effort to respond to inquiries made by State representatives as well as by citizens in the areas surrounding the facility pursuant to an article published in the Milwaukee Journal Sentinel on February 15, 2017. The article discussed potential environmental and human health hazards presented by the operations at the MASD facilities, prompting an inter-agency response. An initial inspection was conducted at this facility on March 2, 2017, in coordination with PHMSA (DOT) and WDNR. Based on observations made during that inspection, EPA procured a federal warrant in order to conduct this sampling event.

Pre-Site Visit

Prior to the sampling event, EPA inspectors completed a Health and Safety Plan (HASP), a Sampling Analysis Plan (SAP), and a Quality Assurance Project Plan (QAPP). An *ex parte* administrative warrant from the U.S. District Court Eastern District of Wisconsin was procured on May 2, 2017.

Site Visit

Ms. Scambiatterra and I made entry at the Facility at 10:10 am. We noticed a distinct chemical odor in the air. I observed visible gray emissions from the stack associated with the furnace. As we walked into the office, we presented the warrant to Ms. Kannenberg. We informed the MASD personnel that we would be sampling at the site that day, and that the warrant allowed us unimpeded access to the site. Mr. Mosely was assigned to assist us through the site and accompanied us to their storage dock, hereinafter referred to as the “Heavies Dock,” which is a holding area for containers that are to be returned to the vendor without being processed. MASD

questioned our ability to enter the site without MASD's attorneys present. Ms. Scambiatterra provided Ms. Kannenberg with the phone number for the Assistant U.S. Attorney, Michael Carter, who was put in contact MASD's attorneys at F&L in order that they may discuss the warrant, and F&L could counsel MASD regarding access to the Facility. Access was acknowledged by MASD at approximately 10:35am.

Photographs were taken at the Heavies Dock (See Appendix A: Photographs 1-3). We instructed the facility representatives not to move the photographed containers from the area. We then proceeded to the drum storage dock at the furnace, hereinafter referred to as the "Furnace Dock." Photographs were taken at this dock (See Appendix A: Photographs 4-10A) We observed a drum of paint-booth filters and cardboard (See Appendix A: Photograph 11). We were told that they were awaiting sample results for those filters.

We next chose to select and stage containers for sampling on the Furnace Dock (See Appendix A: Photographs 12-13). One container was chosen from a truck trailer that had backed up to the Furnace Dock. Two drums were pulled from the conveyor that was heading to the furnace. Two additional drums, which had not yet been placed onto the conveyor, were chosen from the Furnace Dock. Three drums that were used to consolidate silicon-based wastes from off-site vendors were left in place, as they were full, and could not be lined up with the other containers.

After selecting and staging the eight containers, we came down from the Furnace Dock and observed a full drum outside of the main facility building that appeared to contain the same type of waste that was being accumulated in the three full drums on the Furnace Dock (See Appendix A: Photograph 14). Mr. Lowry confirmed that this drum was also a consolidation container. This container was labeled "Non-Regulated." In a garage area, identified by facility personnel as "The Hole", near the "Non-Regulated" container, were approximately 10 additional containers (See Appendix A: Photograph 15). These containers were labeled as "Non-Hazardous." Ms. Scambiatterra asked Messers. Lowry and Mosely if they knew what was in the containers, and they stated that they did not.

We then proceeded to the Heavies Dock to photograph, select and stage containers for sampling (See Appendix A: Photographs 16-17 and 19-20). A photograph was taken of a "Rejected" label on one of the containers (See Appendix A: Photograph 18). It did not appear that all containers were identified with one of these "Rejected" labels. After the selection, we returned to the car to collect our sampling equipment and to don protective gear.

Sampling – Heavies Dock

Sample No.	Time	Equipment Used	Depth of waste in Container	pH (approx.)	Splits Given	Additional Observations	Photo Number
OCS-01	1:06pm	CoLiWaSa, pH paper, ruler, 16oz glass jars.	1.5 inches	4.5	Yes		21-23

OCS-02	1:28pm	CoLiWaSa, pH paper, ruler, 16oz glass jars.	1.25 inches	5	Yes		24-26
OCS-03	1:50pm	CoLiWaSa, pH paper, ruler, 16oz glass jars.	1.5 inches	2.5	Yes		27-29

Sampling - Furnace Dock

Sample No.	Time Taken	Equipment Used	Depth of Waste in Container	Approx. pH	Splits Given	Additional Observations	Photo Number
OCS-04	2:17pm	Scoop, pH paper, ruler, 16oz glass jars	Unable to get depth.	9	Yes	Waste had a thin consistency and was pourable. Strong solvent odor.	30-31
OCS-05	2:32pm	Scoop, pH paper, ruler, 16oz glass jars	5 inches	Inconclusive	Yes	Waste was gummy and had a strong solvent odor.	32-33
OCS-06	2:45pm	Scoop, pH paper, ruler, 16oz glass jars	3.5 inches	Inconclusive	Yes	Waste was gummy and had a strong solvent odor.	34-35
OCS-07	2:57pm	CoLiWaSa, pH paper, ruler, 16oz glass jars	7 inches	6	Yes	Clear watery consistency with black inky residual.	36-38
OCS-08	3:09pm	Scoop, pH paper, ruler, 16oz glass jars	0.25-0.5 inches	4	Yes	Waste had a thin consistency and was pourable. Strong solvent odor.	39-41
OCS-09	3:16pm	Scoop, pH paper, 16oz glass jars	Full Drum	6	Yes	Waste was gummy and had a strong solvent odor. Consolidation drum.	43*
OCS-10 and OCS-10-Dup	3:30pm	CoLiWaSa, pH paper, 16oz glass jars	Full Drum	6	Yes	Waste was gummy and had a strong solvent odor. Consolidation drum.	45*

OCS-11	3:45pm	Scoop, pH paper, 16oz glass jars	Full Drum	6	Yes	Waste was gummy and had a strong solvent odor. Consolidation drum.	47*
OCS-12	3:55pm	Scoop, 16oz jars	N/A	N/A	Yes	Ash lugger box.	48

**NOTE: Entries for photographs 42, 44, and 46 were mistakenly logged into the logbook, however, these photos were never taken. The times associated with these entries in the logbook are attributed to the time the pH readings were made.*

Sampling - Completion

The final sample was taken at 3:55pm. We proceeded to bag and tag the samples at that time. We prepared a chain of custody form for the samples as well as a sample receipt. Copies of these documents were provided to MASD upon our departure from the facility at 6:10pm.

Appendices

- Appendix A: Photograph Log
- Appendix B: Carbon Copy of Chain of Custody
- Appendix C: Receipt for Samples

Appendix A

Photograph Log

Sampling Even Date:

May 4, 2017

Facility Name and ID Number:

Mid-America Steel Drum

EPA ID: WID045953189

Photographers:

Brenda Whitney

Compliance Section 2

-and-

Graciela Scambiatterra

Compliance Section 1

RCRA Branch

Land and Chemicals Division

Camera Used:

Olympus Stylus 600

Serial Number: A47525904

Photograph 1

Taken at 10:19 am CST

Photo ID: P5040001

Heavies Dock.



Photograph 2

Taken at 10:19 am CST

Photo ID: P5040002

Heavies Dock



Photograph 3

Taken at 10:19 am CST

Photo ID: P5040003

Heavies Dock.

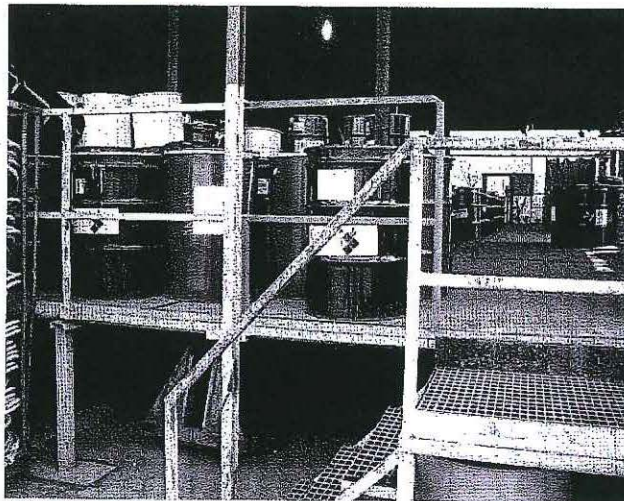


Photograph 4

Taken at 10:40 am CST

Photo ID: P5040004

Furnace Dock.



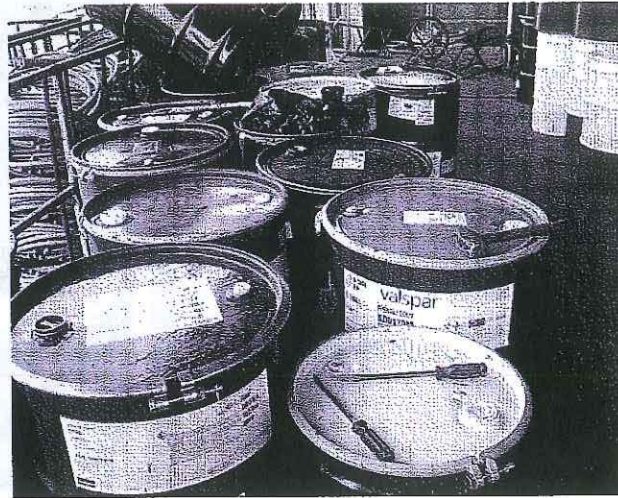
Photograph 5

Taken at 10:41 am CST

Photo ID: P5040005

Furnace Dock.

Note: Two containers in background are tipped into Consolidation Drums.



Photograph 6

Taken at 10:41 am CST

Photo ID: P5040006

Furnace Dock.

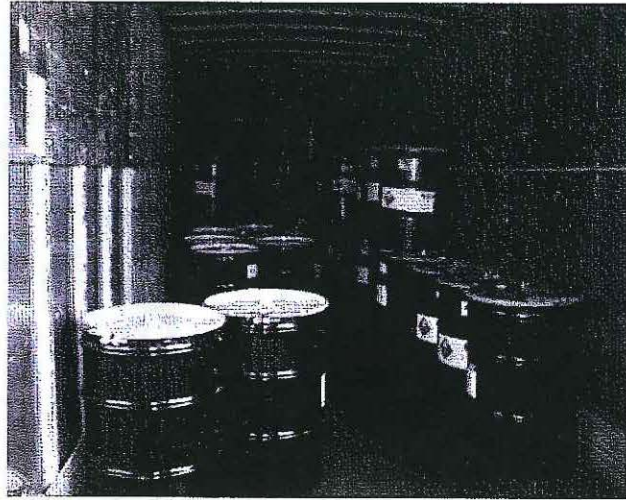


Photograph 7

Taken at 10:41 am CST

Photo ID: P5040007

First trailer at Furnace Dock.

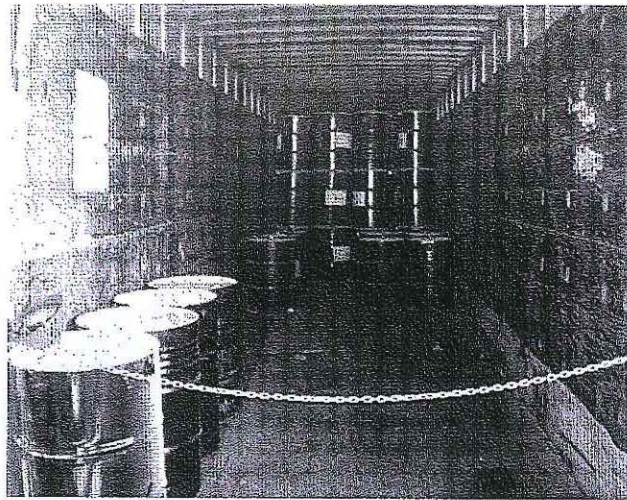


Photograph 8

Taken at 10:41 am CST

Photo ID: P5040008

Second trailer at Furnace Dock.



Photograph 9

Taken at 10:41 am CST

Photo ID: P5040009

Third trailer at the Furnace Dock.



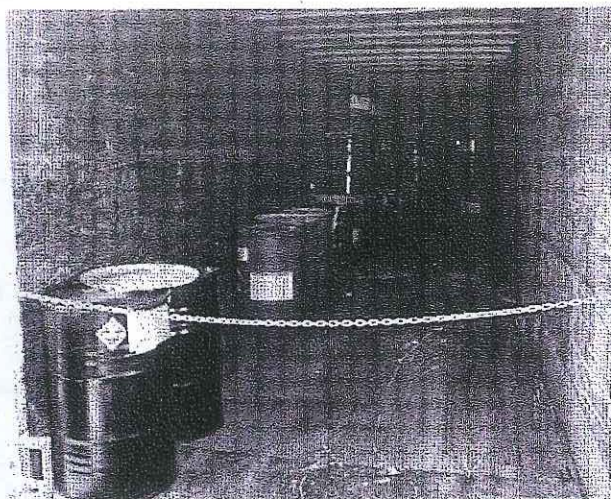
Photograph 10

Taken at 10:41 am CST

Photo ID: P5040010

Fourth trailer at the Furnace Dock.

Note: the foremost container was initially selected for sampling.



Photograph 10-A

Taken at 10:41 am CST

Photo ID: P5040011

Close up of drum in the fourth trailer at the Furnace Dock identified in Photograph 10.

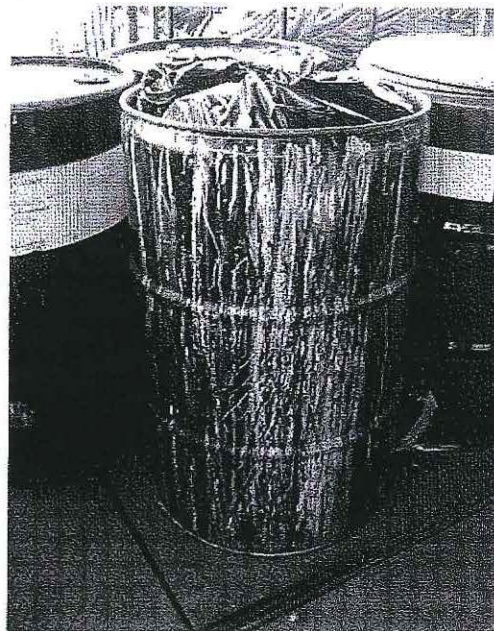


Photograph 11

Taken at 11:25 am CST

Photo ID: P5040012

Full Drum of Paint Booth filters located at the Furnace Dock.



Photograph 12

Taken at 11:35 am CST

Photo ID: P5040013

Five drums staged for Sampling at the Furnace Dock.



Photograph 13

Taken at 11:36 am CST

Photo ID: P5040014

Three drums closed to the railing are staged for sampling at the Furnace Dock.



Photograph 14

Taken at 11:41 am CST

Photo ID: P5040015

Full container of "Non-Regulated Material."

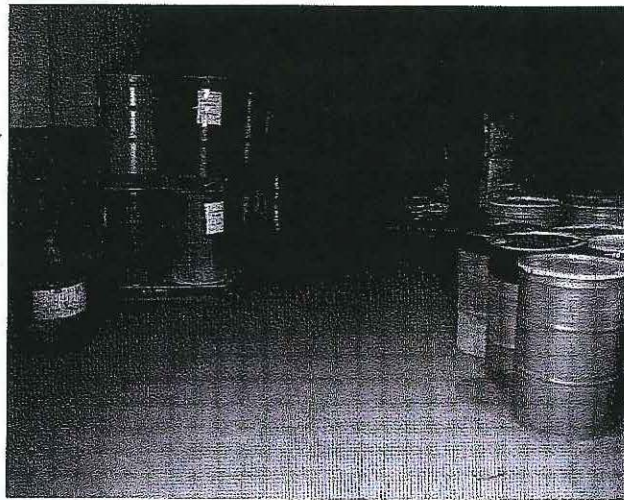


Photograph 15

Taken at 11:50 am CST

Photo ID: P5040016

The "Hole." Containers were marked as "Non-Hazardous."



Photograph 16

Taken at 11:50 am CST

Photo ID: P5040017

Heavies Dock.



Photograph 17

Taken at 11:50 am CST

Photo ID: P5040018

Heavies Dock.

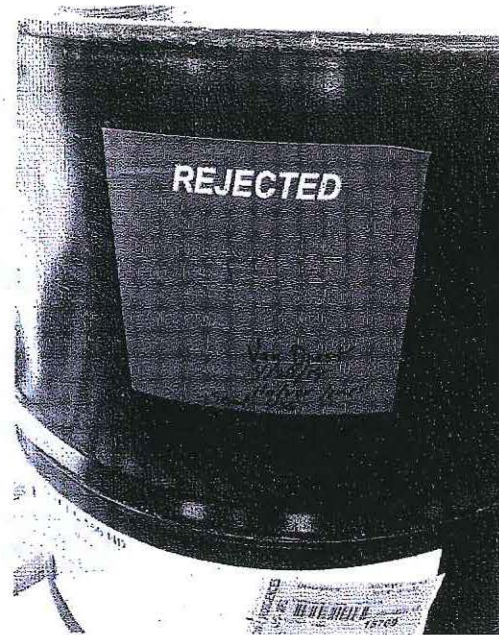


Photograph 18

Taken at 11:55 am CST

Photo ID: P5040019

Rejected Label on drum on the Heavies Dock.



Photograph 19

Taken at 12:15pm CST

Photo ID: P5040020

Staged drums for sampling at the Heavies Dock.



Photograph 20

Taken at 12:50pm CST

Photo ID: P5040021

Staged drums at the Heavies Dock with sampling equipment.



Photograph 21

Taken at 12:55pm CST

Photo ID: P5040022

Waste depth measurement for OCS-01.

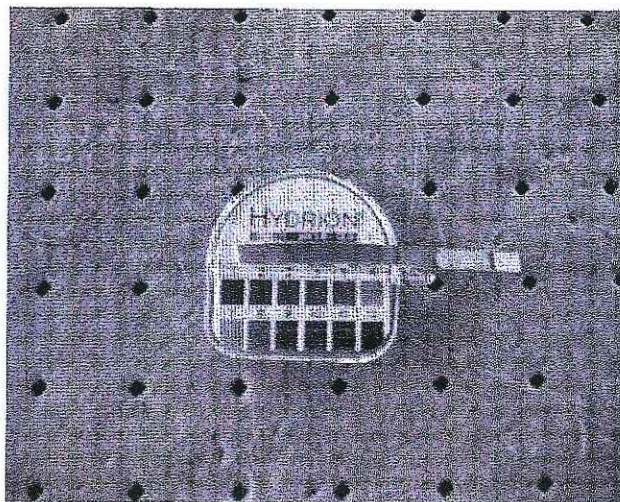


Photograph 22

Taken at 1:00pm CST

Photo ID: P5040023

pH paper for OCS-01.



Photograph 23

Taken at 1:06pm CST

Photo ID: P5040024

OCS-01 completed sample and split.

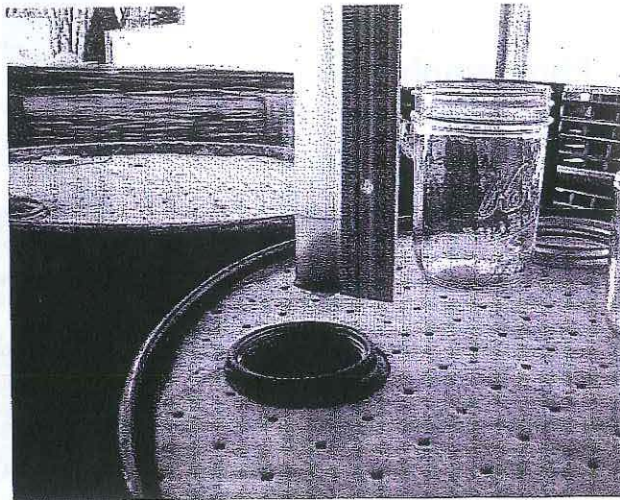


Photograph 24

Taken at 1:11pm CST

Photo ID: P5040025

Waste depth measurement for OCS-02.

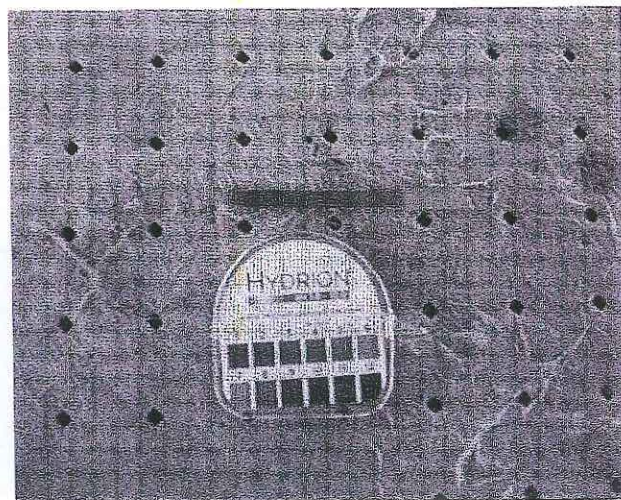


Photograph 25

Taken at 1:12pm CST

Photo ID: P5040026

pH paper for OCS-02.

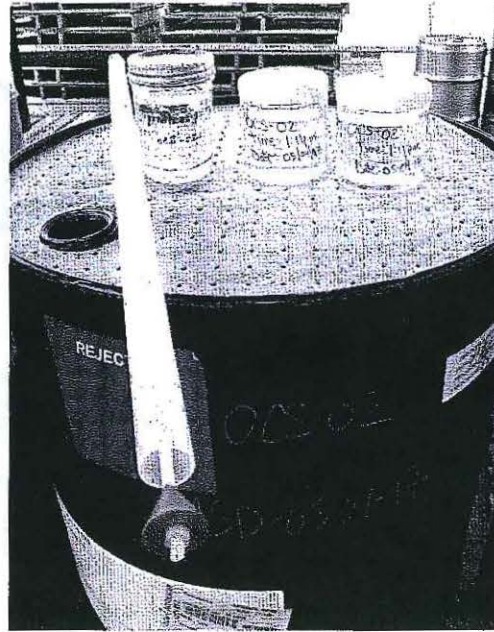


Photograph 26

Taken at 1:28pm CST

Photo ID: P5040027

OCS-02 completed sample and split.

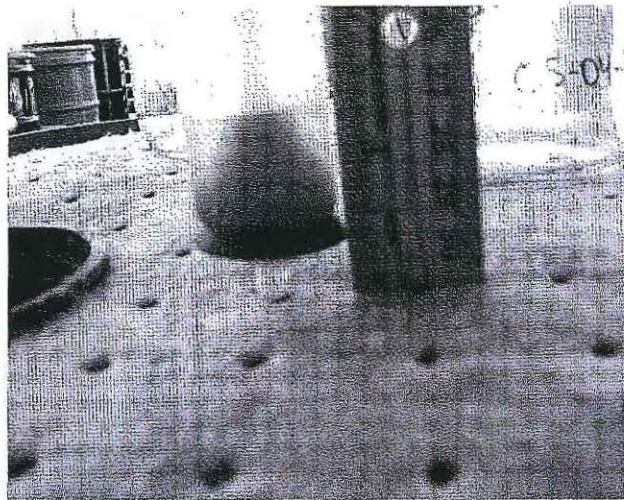


Photograph 27

Taken at 1:35pm CST

Photo ID: P5040028

Waste depth measurement for OCS-03.

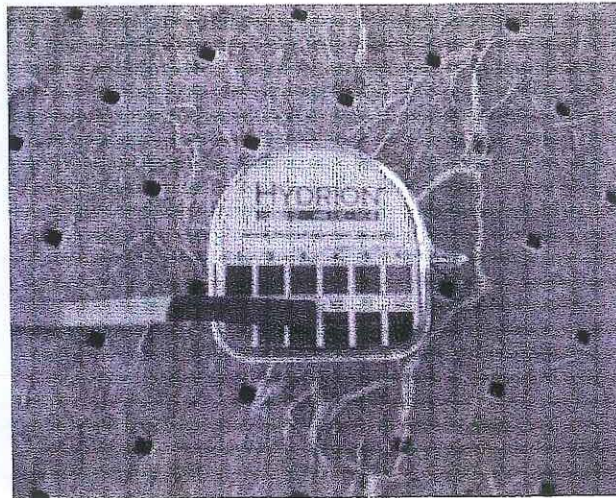


Photograph 28

Taken at 1:36pm CST

Photo ID: P5040029

pH paper for OCS-03.



Photograph 29

Taken at 1:50pm CST

Photo ID: P5040030

OCS-03 completed sample and split. Only one 16oz jar was taken for EPA portion of sample.

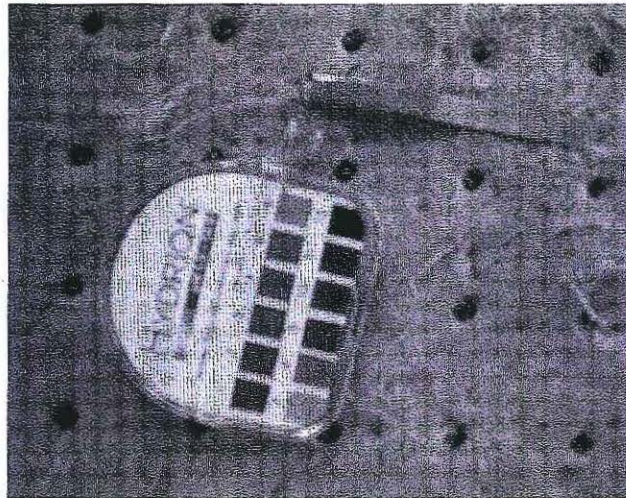


Photograph 30

Taken at 2:16pm CST

Photo ID: P5040031

pH paper for OCS-04.

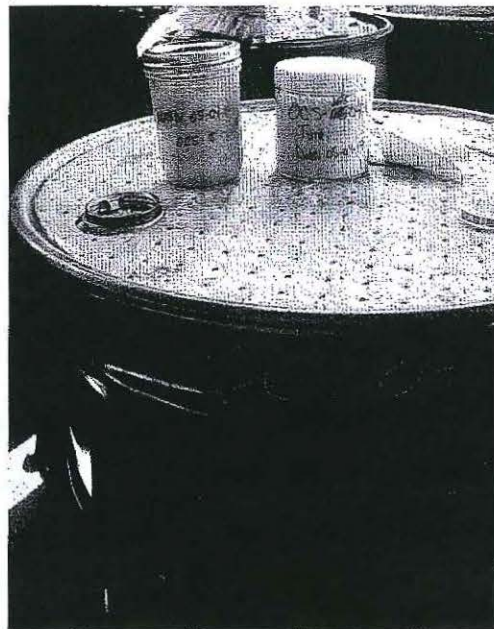


Photograph 31

Taken at 2:17pm CST

Photo ID: P5040032

OCS-04 completed sample and split. Only one 16 ounce jar was taken by EPA for this sample.

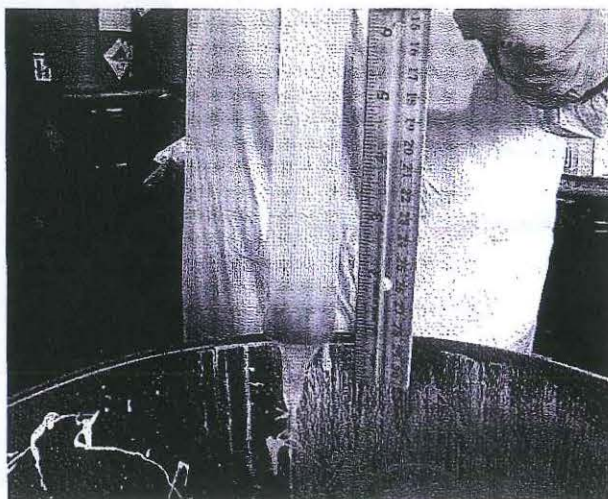


Photograph 32

Taken at 2:23pm CST

Photo ID: P5040033

OCS-05 waste depth measurement.

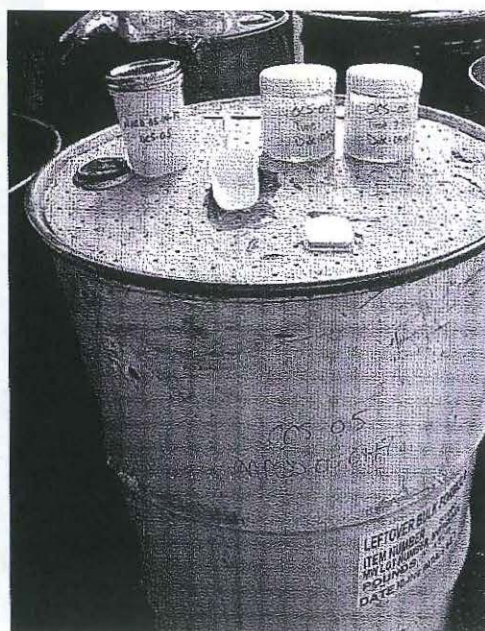


Photograph 33

Taken at 2:32pm CST

Photo ID: P5040034

OCS-05 completed sample and split.

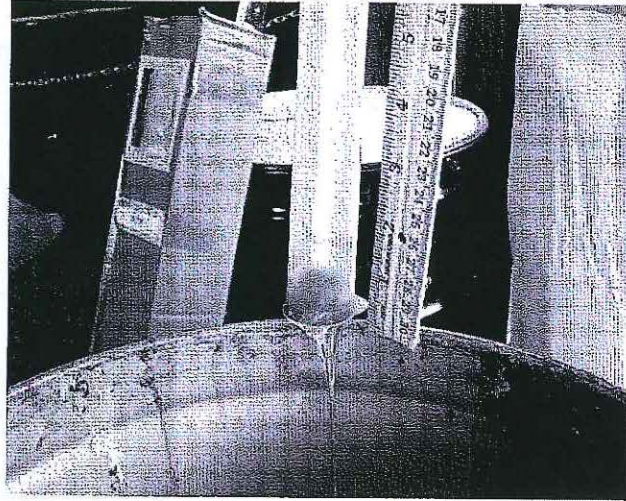


Photograph 34

Taken at 2:37pm CST

Photo ID: P5040035

OCS-06 waste depth measurement.

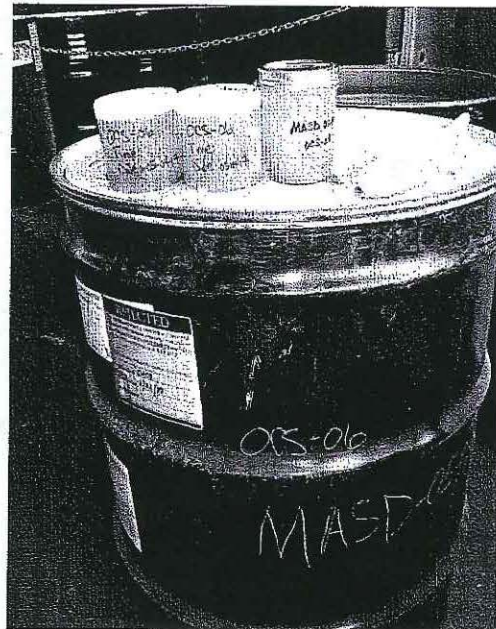


Photograph 35

Taken at 2:45pm CST

Photo ID: P5040036

OCS-06 competed sample and split.
A label on the drum states "Rejected."

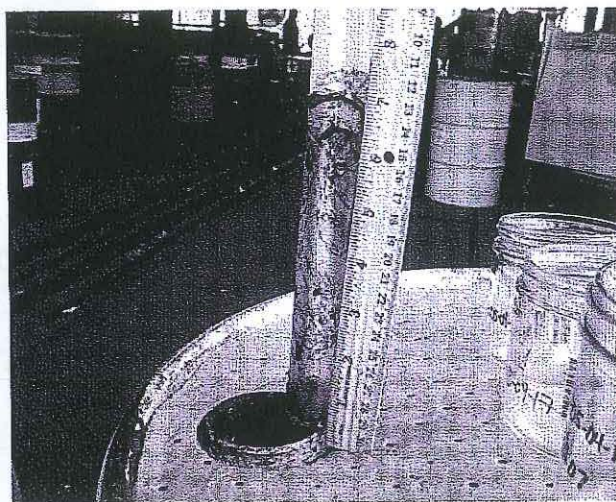


Photograph 36

Taken at 2:50pm CST

Photo ID: P5040037

OCS_07 waste depth measurement.

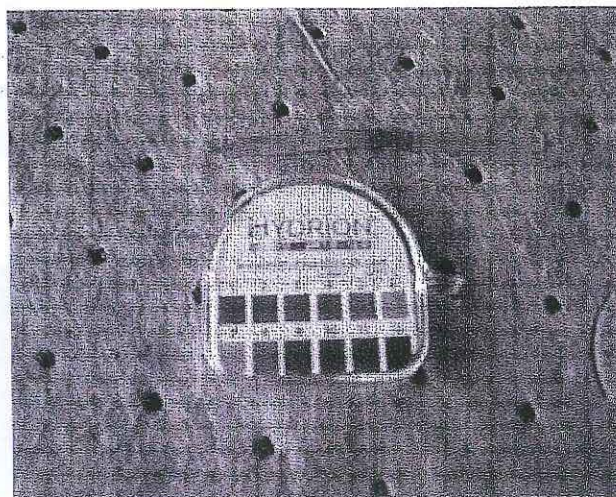


Photograph 37

Taken at 2:57pm CST

Photo ID: P5040038

pH paper for OCS-07.

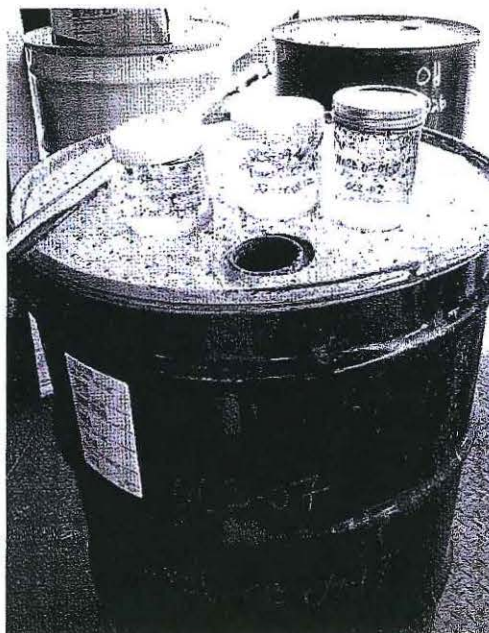


Photograph 38

Taken at 2:57pm CST

Photo ID: P5040039

OCS-07 completed sample and split.

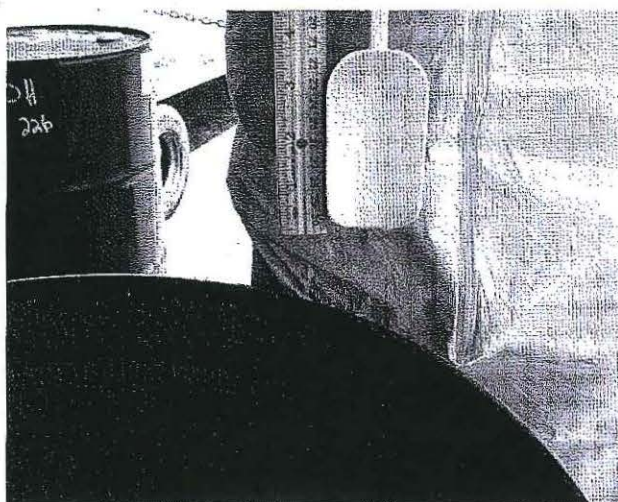


Photograph 39

Taken at 3:01pm CST

Photo ID: P5040040

OCS-08 waste depth measurement demarcated by faint brown line on the scoop.

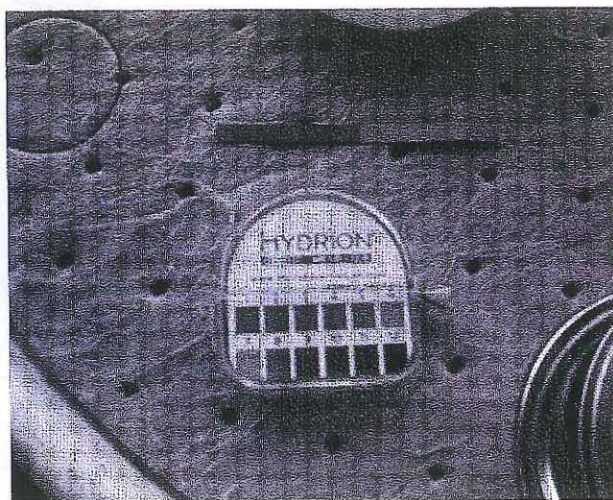


Photograph 40

Taken at 3:06pm CST

Photo ID: P5040041

pH paper for OCS-08.



Photograph 41

Taken at 3:09pm CST

Photo ID: P5040042

OCS-08 completed sample and split.



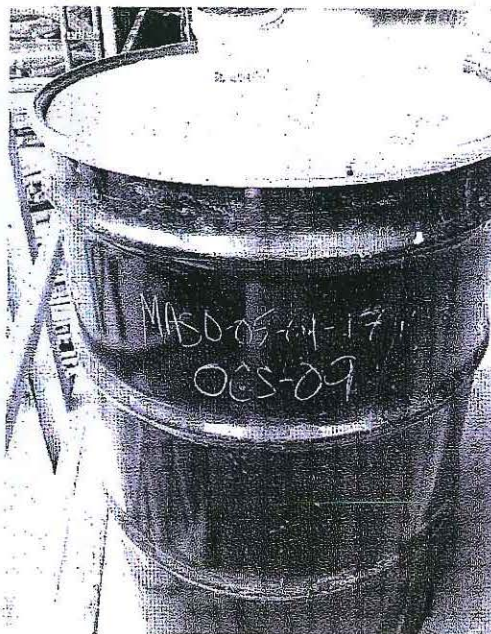
Photograph 43

Taken at 3:16pm CST

Photo ID: P5040043

OCS-09 completed sample and split.

Please note: Photograph 42 was logged in the log book. No photograph was taken.



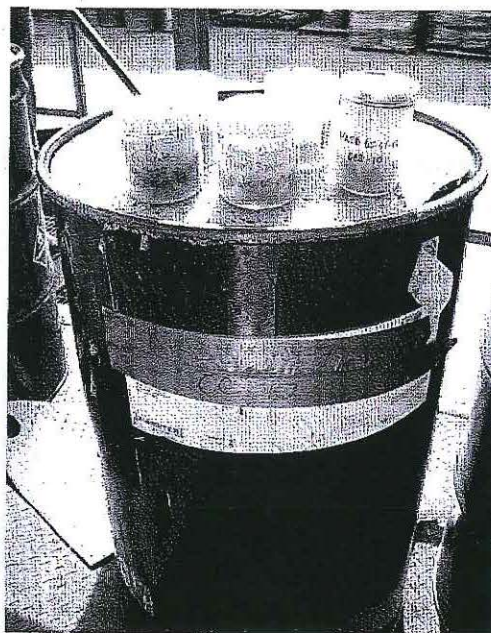
Photograph 45

Taken at 3:30pm CST

Photo ID: P5040044

OCS-10 completed sample, duplicate sample, and split.

Please note: Photograph 44 was logged in the logbook, but was never taken.



Photograph 47

Taken at 3:45pm CST

Photo ID: P5040045

OCS-11 completed sample and split.

Please note: Photograph 46 was logged in the logbook. No photo was taken.



Photograph 48

Taken at 3:55pm CST

Photo ID: P5040046

OCS-12 completed sample and split.



Appendix B

Documents Provided to Facility:

- Chain of Custody Record 5-50252.
 - Receipt for Samples
-

Sampling Event Date:
May 4, 2017

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

Samplers:
Brenda Whitney
Compliance Section 2
-and-
Graciela Scambiaterra
Compliance Section 1
RCRA Branch
Land and Chemicals Division



U.S. Environmental Protection Agency
Region 5

RECEIPT FOR SAMPLES

Name of Facility Mid America Steel Drum		Project Number MASD-05-04-17	
Facility Location 8570 S. Chicago Road Oak Creek, WI 53154			
DESCRIPTION			
<p>- 3 samples taken from the Dock Area (Heavies) of 3 55-gallon drums.</p> <p>- 8 samples taken at the furnace dock of 8 55-gallon drums</p> <p>- 1 sample of the ash from lugger box.</p>			
Facility Representative (signature) <i>Kevin Meyer</i>		EPA Representative (signature) <i>Brenda Whitney</i>	
Name (print) KEVIN MEYER		Name (print) Brenda Whitney	
Title PLANT MANAGER	Date Signed 5-4-17	Title Environmental Engineer	Date Signed 5-4-17

Distribution: Original to Facility Representative; Copy to Project File

