UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 2 7 2017

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Meyer, Plant Manager
Container Life Cycle Management LLC
d/b/a/ Mid-America Steel Drum Company
3950 South Pennsylvania Avenue
Saint Francis, Wisconsin 53235

Re: Notice and Finding of Violation
Container Life Cycle Management LLC
St. Francis, Wisconsin

Dear Mr. Meyer:

The U.S. Environmental Protection Agency is issuing the enclosed Notice and Finding of Violation (NOV/FOV) to Container Life Cycle Management LLC (you) under Section 113(a)(1) and (a)(3) of the Clean Air Act, 42 U.S.C. §§ 7413(a)(1) and (a)(3).

We find that you are violating Section 114 and Title V of the CAA, the regulations for state operating permit programs found in 40 C.F.R Part 70, your facility's construction permit, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Off-Site Waste and Recovery Operations (40 C.F.R. Part 63, Subpart DD), and the Wisconsin State Implementation Plan at your St. Francis, Wisconsin facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV/FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV/FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contacts in this matter are Manoj Patel and Alexandra Letuchy. You may call Mr. Patel at (312) 353-3565, or Ms. Letuchy at (312) 886-6035, respectively, to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

Edward Nam
Director
Air and Radiation Division

Enclosure

cc: Maria Hill, Acting Chief, Compliance, Enforcement, and Emission Inventory Section,
Bureau of Air Management, Wisconsin Department of Natural Resources
Maria.Hill@wisconsin.gov

Kendra Fisher, Regional Leader
Southeast Region
Bureau of Air Management, Wisconsin Department of Natural Resources
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Ms. Linda Benfield, Attorney
Foley & Larder, LLP
lbenfield@foley.com

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	
	)	
Container Life Cycle Management, LLC	)	**NOTICE AND FINDING OF**
St. Francis, Wisconsin	)	**VIOLATION**
	)	
Proceedings Pursuant to	)	**EPA-5-18-WI-01**
Section 113(a)(1) and (a)(3) of the	)	
Clean Air Act, 42 U.S.C.	)	
§§ 7413(a)(1) and (a)(3)	)	

NOTICE AND FINDING OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Notice and Finding of Violation (NOV/FOV) under Section 113(a)(1) and (a)(3) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a)(1) and (a)(3). EPA finds that you are violating Section 114 of the CAA, the Wisconsin State Implementation Plan (SIP) requirements, conditions of your facility's construction permit, Title V of the CAA, the regulations for state operating permit programs found in 40 C.F.R Part 70, and the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Off-Site Waste and Recovery Operations (Subpart DD) at your St. Francis, Wisconsin facility (Facility), as follows.

Statutory and Regulatory Background

Section 114 Requirements

1. Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1), authorizes the Administrator of EPA to require the submission of information for purposes of determining whether any person is in violation of any standard or any requirement of a SIP developed pursuant to 42 U.S.C. § 7410.

Wisconsin SIP

2. On January 18, 1995, EPA approved Wisc. Admin. Code chapter NR 406 as part of the federally enforceable SIP for Wisconsin. 60 Fed. Reg. 3543 (January 18, 1995). On March 11, 2008, EPA approved revisions to Wisc. Admin. Code chapter NR 406 as part of the federally enforceable SIP for Wisconsin. 73 Fed. Reg. 12893 (March 11, 2008).

3. The Wisconsin SIP, at Wisc. Admin. Code § NR 406.03, states that no person may commence construction, reconstruction, replacement, relocation, or modification of a stationary source unless the person has a construction permit for the source or unless the source is exempt from the requirement to obtain a permit under Wisc. Stat. § 144.391(5), or under Wisc. Admin. Code chapter NR 406.

4. On January 18, 1995, EPA approved NR 407 as part of the federally enforceable SIP for Wisconsin. 60 Fed. Reg. 3543.

5. The Wisconsin SIP, at Wisc. Admin. Code § NR 407.05(4)(c), requires that the application shall contain, among other information, the maximum theoretical emissions of all air contaminants from all emissions units, operations, and activities except for those exempted under Wisc. Admin. Code § NR 407.05(4)(9). or (10); and emission rates in tons per year and in terms necessary to demonstrate compliance with emission limitations consistent with the applicable reference test method.

6. On April 27, 1995, EPA approved Wisc. Admin. Code § NR 424.03 as part of the federally enforceable SIP for Wisconsin. 60 Fed. Reg. 20643.

7. The Wisconsin SIP, at Wisc. Admin. Code § NR 424.03(2)(b), requires that all process lines which emit organic compounds, solvents, or mixtures on which construction or modification commenced on or after August 1, 1979, and which are not subject to emission limitations listed elsewhere in Wisc. Admin. Code chapters NR 419 to 423 shall: (1) control organic compound emissions by at least 85%, or (2) where 85% control has been demonstrated to be technologically infeasible for a specific process line, control organic compound emissions by use of the latest available control techniques and operating practices demonstrating best current technology.

Construction Permit

8. On March 9, 2015, Wisconsin Department of Natural Resources (WDNR) issued construction permit No. 14-RSG-142 (2015 Construction Permit) to you.

9. Section G.1.b.(3)(b) of the 2015 Construction Permit requires that respective building fan(s) shall be operated such that exhaust from the overspray filter is vented to the atmosphere (via stack S12C) at a flow rate of 15,000 actual cubic feet per minute (acfm) or greater when the paint booth is in operation.

10. Section ZZZ.1.a.(2) of the 2015 Construction Permit requires that no person may cause, allow or permit the combined monthly average emission of all hazardous air pollutants (HAPs) emitted each month, as identified in Section 112(b) of the CAA ([42 U.S.C. § 7412(b)]), to exceed 4,083 pounds per month, averaged over any 12 consecutive calendar months.

11. Sections ZZZ.1.b.(2) and (3) of the 2015 Construction Permit requires that the permittee shall determine and record the monthly total facility-wide HAP emissions for each HAP.

Title V Permit Program

12. Title V of the CAA, 42 U.S.C. §§ 7661-7661f, establishes an operating permit program for major sources of air pollution.

13. In accordance with Section 502(b) of the CAA, 42 U.S.C. § 7661a(b), the EPA promulgated regulations establishing the minimum elements of a Title V permit program to be administered by any air pollution control agency. See 57 Fed. Reg. 32295 (July 21, 1992). Those regulations are codified at 40 C.F.R. Part 70.

14. Section 502(d) of the CAA, 42 U.S.C. § 7661a(d), provides that each state must submit to the EPA a permit program meeting the requirements of Title V.

15. On November 30, 2001, EPA granted Wisconsin final approval of its Title V CAA Permit Program, effective November 30, 2001. 66 Fed. Reg. 62951. See also 40 C.F.R. Part 70, Appendix A.

16. On February 28, 2006, EPA granted Wisconsin final approval on revisions to its Title V CAA Permit Program, effective March 30, 2006. 71 Fed. Reg. 9934.

17. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate except in compliance with a Title V permit.

18. 40 C.F.R. § 70.5(a) provides that "for each part 70 source, the owner or operator shall submit a timely and complete permit application in accordance with this section."

19. 40 C.F.R. § 70.5(c) describes the information that must be provided in a permit application for such application to be considered complete. The required information includes all emissions of pollutants for which the source is major, and all emissions of regulated air pollutants. A permit application shall describe all emissions of regulated air pollutants emitted from any emissions unit, except where such units are exempted under 40 C.F.R. § 70.5(c).

20. 40 C.F.R. § 70.5(d) requires that the permit application contain a certification by a responsible official of truth, accuracy, and completeness.

21. 40 C.F.R. § 70.1(b) provides that all sources subject to Title V shall have a permit to operate that assures compliance by the source with all applicable requirement.

National Emission Standards for Hazardous Air Pollutants

22. Section 112 of the CAA, 42 U.S.C. § 7412, requires EPA to promulgate a list of all categories and subcategories of major sources and area sources of HAP and establish emissions standards for the categories and subcategories. These emission standards are known as the NESHAP.

23. The NESHAPs in 40 C.F.R. Part 63 are national technology-based performance standards for HAP sources in each category that become effective on a specified date. The purpose of these standards is to ensure that all sources achieve the maximum degree of reduction in emissions of HAP that EPA determines is achievable for each source category.

24. Pursuant to Section 112(b) of the CAA, 42 U.S.C. § 7412(b), EPA designates HAPs, which present or may present a threat of adverse effects to human health or the environment.

25. Section 112(a)(1) of the CAA, 42 U.S.C. § 7412(a), defines "major source" as any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year (TPY) or more of any HAP or 25 TPY or more of any combination of HAPs.

26. Section 112(i)(3) of CAA, 42 U.S.C. § 7412(i)(3), and 40 C.F.R. § 63.4, prohibit the owner or operator of any source from operating such source in violation of any NESHAP applicable to such source.

27. The NESHAP, at 40 C.F.R. Part 63, Subpart A, contains general provisions applicable to the owner or operator of any stationary source that contains an affected source subject to the NESHAP at Part 63. These general provisions include definitions at 40 C.F.R. § 63.2.

28. The NESHAP, at 40 C.F.R. § 63.2, defines "affected source" as the collection of equipment, activities, or both within a single contiguous area and under common control that is included in a CAA Section 112(c) source category or subcategory for which a Section 112(d) standard or other relevant standard is established pursuant to Section 112 of the CAA.

NESHAP for Off-Site Waste Recovery Operations

29. On July 1, 1996, EPA promulgated the Off-Site Waste Recovery Operations NESHAP, codified at 40 C.F.R. Part 63, Subpart DD. 61 Fed. Reg. 34140. EPA subsequently amended the rule on January 8, 2001, and March 18, 2015. 66 Fed. Reg. 1263 and 80 Red. Reg. 14248. Subpart DD establishes emission standards, requirements to demonstrate initial and continuous compliance with emission limits, operating limits, work practice standards, and recordkeeping requirements associated with off-site waste recovery operations.

30. The NESHAP, at 40 C.F.R. § 63.680(a)(1) and (a)(2)(i), provides that Subpart DD applies to the owner and operator of a plant site that is both a major source of HAP emissions as defined in 40 C.F.R. § 63.2 and includes a waste management operation that receives off-site material, and the operation is regulated as a hazardous waste treatment, storage, and disposal facility (TSDF) under either 40 C.F.R. Part 264 or Part 265.

31. The NESHAP, at 40 C.F.R. § 63.680(b)(1), provides that an off-site material is a material that meets all of the following criteria: (1) the material is a waste, used oil, or used solvent as defined in 40 C.F.R. § 63.681; (2) the waste, used oil, or used solvent is not produced or generated within the plant site, but the material is delivered, transferred, or otherwise moved to the plant site from a location outside the boundaries of the plant site; and (3) the waste, used oil, or used solvent contains one or more of the HAP listed in Table 1 of Subpart DD based on the composition of the material at the point-of-delivery, as defined in 40 C.F.R. § 63.681.

32. The NESHAP, at 40 C.F.R. § 63.680(c)(1) provides that for each operation specified in paragraphs (a)(2)(i) through (vi) of 40 C.F.R. § 63.680 that is located at the plant site, the

affected source is the entire group of off-site material management units associated with the operation. An off-site material management unit may be any of the following: a tank, container, surface impoundment, oil-water separator, organic-water separator, or transfer system used to manage off-site material.

33. The NESHAP, at 40 C.F.R. § 63.680(e)(2), provides that the owner or operator of an affected source for which construction or reconstruction commences on or after October 13, 1994, must achieve compliance with the provisions of Subpart DD (except 40 C.F.R. §§ 63.685(b)(2), 63.691(b)(2), and 63.691(c)(3)(i) and (ii)) on or before July 1, 1996, or upon initial startup of operations, whichever date is later as provided in 40 C.F.R. § 63.6(b).

34. The NESHAP, at 40 C.F.R. § 63.680(e)(2), also provides that new affected sources that commenced construction or reconstruction after October 13, 1994, but on or before July 2, 2014, shall be in compliance with the tank requirements of 40 C.F.R. § 63.685(b)(2) two years after the publication date of the final amendments, the equipment leak requirements of 40 C.F.R. § 63.691(b)(2) one year after the publication date of the final amendments, and the pressure relief device monitoring requirements of 40 C.F.R. § 63.691(c)(3)(i) and (ii) three years after the effective date of the final amendments.

35. The NESHAP, at 40 C.F.R. § 63.680(e)(2), also provides that new affected sources that commence construction or reconstruction after July 2, 2014, shall be in compliance with the tank requirements of 40 C.F.R. § 63.685(b)(2), the equipment leak requirements of 40 C.F.R. § 63.691(b)(2), and the pressure relief device monitoring requirements of 40 C.F.R. § 63.691(c)(3)(i) and (ii) upon initial startup or by the effective date of the final amendments, whichever is later.

36. The NESHAP, at 40 C.F.R. § 63.681, defines container as a portable unit used to hold material. Examples of containers include, but are not limited to, drums, dumpsters, roll-off boxes, bulk cargo containers commonly known as "portable tanks" or "totes", cargo tank trucks, and tank rail cars.

37. The NESHAP, at 40 C.F.R. § 63.681, defines oil-water separator as a separator that is used to separate oil from water.

38. The NESHAP, at 40 C.F.R. § 63.681, defines tank as a stationary unit that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provide structural support and is designed to hold an accumulation of liquids or other materials.

39. The NESHAP, at 40 C.F.R. § 63.681, defines transfer system as a stationary system for which the predominant function is to convey liquids or solid materials from one point to another point within a waste management operation or recovery operation. For the purpose of Subpart DD, the conveyance of material using a container or a self-propelled vehicle (e.g., a front-end loader) is not a transfer system. Examples of a transfer system include, but are not limited to, a pipeline, an individual drain system, a gravity-operated

conveyor (such as a chute), and a mechanically-powered conveyor (such as a belt or screw conveyor).

Relevant Factual Background

40. Container Life Cycle Management LLC (CLCM) owns and operates a steel and plastic drum reconditioning processing facility at 3950 South Pennsylvania Ave, Saint Francis, Wisconsin (Facility).

41. At the Facility, CLCM reconditions used industrial drums. The containers can either be plastic or metal depending upon their original use and the materials stored. These materials include industrial liquids. At the facility, CLCM employees the inspect, clean, refurbish, leak-test, paint, and resell the containers. The cleaning portion of process consists of interior and exterior washing/soaking and rinsing.

42. On November 20, 2016 and May 4, 2017, EPA conducted inspections of the Facility to evaluate CLCM's compliance with the CAA.

43. On April 5, 2017, EPA issued an information request to the Facility under Section 114 of the CAA, 42 U.S.C. § 7414 (Section 114 Information Request). The information request required, among other things, that CLCM conduct performance testing to measure volatile organic compounds (VOC) emissions exhausted through the Caustic Scrubber (Control C10) at Stack S98 and to measure the VOC emission removal efficiency (%) of the Caustic Scrubber (Control C10).

44. CLCM operates the following emission units at the Facility, as identified in the 2015 Construction Permit: Interior Caustic Preflush (Process P80A), Exterior Wash/Soaker (Process P80B), Exterior Rinse (Process P80C), Internal Drum Washer (Process P42), Drum-Caustic Pre-Flush (Process P95), Exterior wash/Soaker (Process P72), Exterior Rinse (Process P73), and Internal Double Split Washer (Process P74), that all exhaust through a Caustic Scrubber (Control C10) at Stack S98. The Facility also operates an Acidizer (Process P75) that exhaust through an Acid Scrubber (Control C70), that in turn exhausts through the Caustic Scrubber (Control C10) at Stack S98. CLCM also operates natural gas fired heaters. Mists and vapors generated from the processes described above in this paragraph also exhaust through the Caustic Scrubber (Control C10) at Stack S98.

45. CLCM operates an Auto Exterior Drum Spray Booth (Process 32C), controlled by an Overspray Filter (for PM control only) that exhausts at Stack S12C.

46. CLCM operates a Curing Oven (Process 32B) that exhausts at Stack S12B.

47. On September 19, 2017, contractors for CLCM conducted performance testing at Stack S98, Stack S12C, and Stack S12B (the Performance Test) in response to the Section 114 Information Request. CLCM submitted the results of the Performance Test to EPA in a report on October 27, 2017.

48. The Performance Test measured total hydrocarbons (THC) using Method 25 at Stack S98, Stack S12C, and Stack S12B, but failed to measure the VOC emissions at the

Caustic Scrubber (Control C10) at Stack S98 and to measure the VOC emission removal efficiency (%) of the Caustic Scrubber (Control C10).

49. The Performance Test measured a THC emission rate of 53.65 pounds per hour (lb/hr) from Stack S98, a THC emission rate of 6.02 lb/hr from Stack S12C, and a THC emission rate of 2.17 lb/hr from Stack S12B. Using these emission rates, EPA calculated that the Facility's annual facility VOC emission rate is in excess of 100 tons per year, after accounting for the contribution of acetone, which is included in THC emission findings but not regulated as a VOC.

50. The Performance Test measured VOCs and HAPs using Method TO-15 at Stack S98. One summa canister sample was collected during each run in order to characterize organic chemicals present in the exhaust.

51. In response to the Section 114 Information Request, on May 10, 2017, CLCM provided a spreadsheet quantifying monthly HAP emissions from the Auto Exterior Drum Spray Booth P32C. CLCM did not determine and record HAPs from the interior and exterior washing/soaking and rinsing process lines that exhaust through the Caustic Scrubber (Control C10) at Stack S98.

52. Using the Performance Test summa canister HAP sample results combined with monthly HAP emissions from the Auto Exterior Spray Booth P32C, EPA calculated an annual facility HAP emission rate in excess of 25 tons per year and a combined monthly average emission rate of all HAPs, in excess of 4,083 pounds per month, averaged over any 12 consecutive calendar months.

53. The Performance Test measured the exhaust flow rate from the Auto Exterior Drum Spray Booth (Process 32C), controlled by an Overspray Filter (for PM control only) that exhausts at Stack S12C. The average flow rate in acfm was lower than 15,000.

54. In CLCM's August 8, 2014 Construction Permit Application, CLCM stated that the Caustic Scrubber (Control C70) only controls Sodium Hydroxide (NaOH) emissions.

55. In CLCM's November 12, 2015 Operation Permit Application, CLCM applied for a Synthetic Minor, Non – Part 70 Source Operation Permit. CLCM calculated its actual VOC emissions for the Facility to be 43.58 tons per year and its potential to emit to be 70.48 tons per year and CLCM did not account for any VOC emissions from the interior and exterior washing/soaking and rinsing process lines that exhaust through a Caustic Scrubber (Control C10) at Stack S98 in its VOC calculations.

56. CLCM has not applied for and does not have a Title V, Part 70 Source Operation Permit.

57. On or about November 27, 2017, EPA notified CLCM that EPA had determined, among other things, that CLCM had stored hazardous waste without a license. See RCRA Notice of Violation dated November 27, 2017 (RCRA NOV).

58. In accordance with the RCRA NOV, CLCM's waste management operation at the Facility is regulated as a hazardous waste TSDF under 40 C.F.R. Part 264.

59. CLCM operates a waste management operation at the Facility consisting of a collection of off-site management units and equipment components. The off-site management units include the tanks, containers, oil-water separator, and transfer systems.

60. CLCM's waste management operation at the Facility receives off-site material that is: (i) a waste, i.e. a material generated from industrial operations that is discarded, (ii) not produced or generated within the plant site, and (iii) contains HAPs, such a hexane, methyl ethyl ketone (MEK), and toluene.

Violations

Section 114 Requirements

61. CLCM failed to conduct the Performance Test to measure VOC emissions exhausted through the Caustic Scrubber (Control C10) at Stack S98 and to measure the VOC emission removal efficiency (%) of the Caustic Scrubber (Control C10) in violation of Section 114(a) of the CAA, 42 U.S.C. § 7414(a).

Wisconsin SIP

62. CLCM failed to include in its operation permit application emissions-related information for VOC emissions from the emissions units routed to the Caustic Scrubber (Control C10), exhausted at Stack 98 in violation of the Wisconsin SIP, at Wisc. Admin. Code § NR 407.05(4).

63. CLCM failed to control organic compounds from the process lines which exhaust through the Caustic Scrubber (Control C10), at Stack 98 by at least 85%, in violation of the Wisconsin SIP, at Wisc. Admin. Code § NR 424.03(2)(b).

Construction Permit

64. CLCM emitted a combined monthly average emission of all HAPs, in excess of 4,083 pounds per month, averaged over any 12 consecutive calendar months, in violation of Construction Permit condition ZZZ.1.a.(2).

65. CLCM failed to determine and record the contribution of HAPs from the interior and exterior washing/soaking and rinsing process lines that exhaust through a Caustic Scrubber (Control C10) at Stack S98 to the total facility-wide HAP calculation in violation of Construction Permit conditions ZZZ.1.b.(2) and (3).

66. CLCM failed to operate the respective building fan(s) such that exhaust from overspray filter are vented to the atmosphere (via stack S12C) at a flow rate of 15,000 acfm or greater when the paint booth is in operation in violation of Construction Permit condition G.1.b.(3)(b).

Title V Violations

67. CLCM failed to submit a timely, accurate, and complete Title V permit application to WDNR in violation of 40 C.F.R. §§ 70.5(a),(c), and (d), and Section 503 of the CAA, 42 U.S.C. § 7661a(b).

68. CLCM operated a facility subject to Title V of the CAA after the effective date of Wisconsin's Title V CAA Permit program in violation of 40 C.F.R. § 70.7(b) and Section 502(a) of the CAA, 42 U.S.C. § 7661a(a).

NESHAP Violations

69. CLCM's Facility is a major source of HAP emissions, operates a waste management operation that receives off-site material and the operation is regulated as a hazardous waste TSDF under 40 C.F.R. Part 264. CLCM failed to demonstrate initial and continuous compliance with emission limits, operating limits, work practice standards, and recordkeeping requirements associated with off-site waste recovery operations in violation of Subpart DD.

Environmental Impact of Violations

70. These violations have caused or can cause excess emissions of VOCs, which contribute to ozone, and HAPs (including hexane, toluene, and MEK).

Ozone: Breathing ozone contributes to a variety of health problems including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level ozone also can reduce lung function and inflame lung tissue. Repeated exposure may permanently scar lung tissue.

Hexane: Acute exposure to hexane by inhalation causes mild central nervous system depression. Symptoms include dizziness, slight nausea, and headaches. Chronic inhalation exposure causes a decreased ability to move or feel because of nerve damage. Symptoms include numbness in the extremities, muscular weakness, blurred vision, headache, and fatigue.

Toluene: The central nervous system is the primary target organ for toluene toxicity in both humans and animals for acute and chronic exposures. Central nervous system dysfunction (which is often reversible) and narcosis have been frequently observed in humans acutely exposed to low or moderate levels of toluene by inhalation; symptoms include fatigue, sleepiness, headaches, and nausea. Central nervous system depression and death have occurred at higher levels of exposure. Chronic inhalation exposure of humans to toluene causes irritation of the upper respiratory tract and eyes, sore throat, dizziness, headache, and difficulty with sleep.

MEK: Acute exposure of humans to high concentrations of methyl ethyl ketone produces irritation to the eyes, nose, and throat. Other effects reported from acute inhalation exposure in humans include central nervous system depression, headache, and nausea. Limited information is available on the chronic effects of methyl ethyl ketone in humans

from inhalation exposure. One study reported nerve damage in individuals who sniffed a glue thinner containing methyl ethyl ketone and other chemicals.

11/27/17
Date

Edward Nam
Director
Air and Radiation Division

CERTIFICATE OF MAILING

I certify that I sent a Notice and Finding of Violation, No. EPA-5-18-WI-01, by Certified Mail, Return Receipt Requested, to:

Kevin Meyer, Plant Manager
Container Life Cycle Management LLC
d/b/a/ Mid-America Steel Drum Company
8570 South Chicago Road
Oak Creek, Wisconsin 53154

I also certify that I sent copies of the Notice of Violation by email to:

Maria Hill, Acting Chief
Compliance, Enforcement, and Emission Inventory Section
Bureau of Air Management
Wisconsin Department of Natural Resources
Maria.Hill@wisconsin.gov

Kendra Fisher, Regional Leader
Southeast Region
Bureau of Air Management
Wisconsin Department of Natural Resources
Kendra.Fisher@wisconsin.gov

Ms. Linda Benfield
Attorney
Foley & Larder, LLP
lbenfield@foley.com

On the 27th day of November 2017.

Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7011 1150 0000 2643 8937