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

DATE: NOV 20 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Industrial Container Services, Inc., Hastings, Minnesota

FROM: Manojkumar P. Patel, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Chief
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Industrial Container Services, Inc., Hastings, Minnesota

Facility Location: 990 Spiral Blvd., Hastings, Minnesota 55033

Date of Inspection: September 25, 2019

EPA Inspector(s):
1. Manojkumar P. Patel, Environmental Engineer
2. Albana Bega, Environmental Engineer

Other Attendees
1. Joseph Slattery, Facility Manager, Industrial Container Services, Inc.

Contact Email Address: joe.slattery@iconserv.com

Purpose of Inspection: Evaluation of Industrial Container Washing Operations

Facility Type: Container Refurbishing Industry

Regulations Central to Inspection: Minnesota State Implementation Plan Requirements

Arrival Time: 9:00 AM CST
Departure Time: 3:45 PM CST

Inspection Type:

☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

☒ Credentials Presented
☒ CBI warning to facility provided

The following information was obtained verbally from the facility personnel unless otherwise noted.

Company Ownership: In or around March 2019, Mouser Packaging Corporation purchased Industrial Container Services, Inc. In or around 2016, Industrial Container Services, Inc. purchased Twin City Container which owned and operated this facility.

Process Description:

Industrial Container Services, Inc. (the facility) is located at 990 Spiral Blvd., Hastings, Minnesota. The facility receives empty drums from food, coil, surface coating, spent oil industries, industrial solvent manufacturing, and chemical industries around the local area. Empty metal drums are washed, cleaned, repaired, painted, and then resold into the market.

A detailed process description is attached in Appendix B.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations: None

Photos and/or Videos: were taken during the inspection.

The facility personnel took digital images as requested by EPA during this inspection. The facility has not submitted these digital images to EPA.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Requested documents:

(1) Bag House Maintenance Schedule;
(2) Fume Scrubber Maintenance Sheet;
(3) Hastings Air Permit;

(4) Photos - All of the photos taken during the inspection; and
(5) All of the SDS sheets for coatings used at the facility.

Concerns: We informed the facility that several drum refurbishing facilities in Region 5 are emitting significant amount of volatile organic compounds (VOC) from the interior and exterior washing operations. Based on the EPA's experience, EPA believes that they may be of concerns here as well. EPA informed the facility personnel that EPA may issue a Section 114 of the CAA Information Request to the facility to perform VOC testing on the dry scrubber. EPA may seek additional information from the facility.

EPA also informed that EPA will investigate type of the permit this facility may have as it was issued "Option D Registration Permit" in or around June 21, 2002.

SIGNATURES

Report Author: _____ Date: 11/20/19

Section Chief: _____ Date: 11/20/19

APPENDICES AND ATTACHMENTS

1. Appendix A – Digital Image Log
2. Production Process Description – Detailed – Submitted by ICS – Hastings, MN.

Facility Name: Industrial Container Services, Inc., Hastings, Minnesota
Facility Location: 990 Spiral Blvd., Hastings, Minnesota 55033
Date of Inspection: September 25, 2019

APPENDIX A: DIGITAL IMAGE LOG

1. **Inspector Name:** Manojkumar P. Patel Albana Bega	2. **Date(s) of Inspection:** September 25, 2019
3. **Company/Facility Name:** Industrial Container Services, Inc., Hastings, Minnesota	4. **Street Address, City, State:** 990 Spiral Blvd., Hastings, Minnesota 55033
5. **Number of Images and Videos:** 04	6. **Archival Record Location:** ICS Hastings, MN CAA Inspection 09/25/2019

APPENDIX B: PROCESS DESCRIPTION

See Attached.

INDUSTRIAL CONTAINER SERVICES

ICS – Twin City Container
990 Spiral Blvd
Hastings, MN 55033
Phone 651-480-3786
Fax 651-480-2542
www.iconserv.com

To whom it concerns:

Production process for Hastings, MN plant.

The following is a description of the production process as it relates to steel and plastic 55 gal. closed head containers. Closed head steel and plastic containers are transported to the Hastings plant via semi-trucks. These semi-trucks can be customer owned, 3rd party carriers or our own company trucks. Semi-trailers will hold, on average, 300 empty containers. Semi-trailers are set at the shipping/receiving docs and off loaded by hand by dock workers. The containers are sorted by product last contained. Containers last containing non-oil products are processed 1st through the chemical flushing machines. These chemical flushing machines flush the containers with 190 degree F water that is charged with sodium hydroxide for a period of 18 seconds. Once the containers have been processed they are transferred to the progressive wash line where they meet up with containers that last contained oil products. Workers load the containers onto a conveyor that transfers and orientates the containers to the proper positions for washing. Each container is rinsed on the inside with 190 degree F water (no added detergent.) There are 6 stations each container passes through for interior washing, each station is set at 18 second wash times. Throughput capacity is 3 containers per minute when processing steel containers and 2 per minute when processing plastic containers. Containers exit the progressive wash line and transfer by roller conveyor through an external rinse. The external rinse sprays each container with 190 degree F water, no detergent added. Containers exit the external rinse station and are transferred by chain and roller conveyor to the interior inspection station. Workers inspect the interior of each container for cleanliness. Up to this point steel and plastic containers have underwent the exact same processing. From here steel and plastic containers branch in different directions.

Plastic Containers
Upon completing the interior inspection plastic containers are transferred by hand to the pressure differential testing station. At this station each plastic container is tested for leak proofness. Containers that pass the test have the fittings tightened and are transferred to the exterior washing station. Containers that fail are marked and sent to the plastic shredder. Workers use hand scrub pads to remove dirt and any stencils. Plastic containers are loaded on the plastic brusher/rinser for cleaning and final rinsing of the exterior. Plastic containers are inspected both inside and out at the final inspection. Workers apply a test approval stencil on each plastic container and load each onto the semi-trailer.

Steel Containers
Upon completing the interior inspection steel containers are capped and transferred to the label removal station. Workers use angle grinders to remove labels from the containers. The containers are transferred by chain conveyor to the steel shot blaster. The blasting machine uses small steel balls to blast/remove the paint from the exterior of the containers. The containers are transferred out of the blaster to the submersion leak proofness testing stations. Two containers are plugged, pressurized and submerged.

INDUSTRIAL CONTAINER SERVICES

ICS – Twin City Container
990 Spiral Blvd
Hastings, MN 55033
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The worker visually inspects the water surface area for the presence of leaks for each submerged container. Upon completion of the leak proofness test containers are transferred by chain conveyor to an inspection station. Workers complete an interior and exterior inspection of each container. Containers that fail are transferred to the scrap crusher and recycled. Containers that pass inspection are transferred to a roller conveyor and moved to the paint booth. A worker installs a 2" fitting in the container and transfers it to the rotator where the paint coating is applied using Graco airless spray guns. Operating pressure is 1500 psi and there are 14 different colors of paint. The containers are transferred out of the rotator and onto a roller conveyor that transports each container to the bake oven. Containers are transferred to a chain conveyor that moves each container through the 325 degree F bake oven, travel time through the oven is 12.5 minutes. Upon exiting the bake oven each container transfers via chain conveyor to the final inspection station. At this station workers conduct an interior and exterior inspection of each steel container. Quality labels are applied and each container is loaded in to a semi-trailer for shipment.

Truly

Joseph Slattery
Plant Manager