03/25/2015 6:19PM L015299 1970455553 01 2,455,537 170000807697 12/09/2014 L TOTE DETAILING SPECIALISTS INC 03/23/2015 TOMREUTE B:13965 F:50497 I:00000284

Confidential MJK

Illinois Environmental Protection Agency
Bureau of Land - Des Plaines
Complaint Log

Complaint ID # C15-043

BOL ID # : 1970455553 **Facility Name :** Tote Detailing Specialists Inc

Facility Address : 500 D Oak Leaf Ct

City : Joliet **Zip Code :** 60436 **County :** Will

Complainant :	Joseph Formhals	Respondent :	Tote Detailing Specialists Inc
Address :	Joliet Fire Chief	Address :	500 D Oak Leaf Ct
City :	Joliet State : IL	City :	Joliet State : IL
Zip Code :	60436	Zip :	60436
Phone :	(815) 724-3500	Phone :	(815) 725-8501
Date Received :	11/5/2014	Received By :	CTG
Investigator:	Haennicke	Start Time:	10:30
Inspect Date:	12/9/2014	End Time:	12

Complaint Details :

General waste management practices.

IEPA-DIVISION OF RECORDS MANAGEMENT RELEASABLE
MAR 04 2015
REVIEWER: MJK
RECEIVED
JAN 23 2015
IEPA/BOL

Summary :

On December 4, 2014, I left a message for Joliet Fire Chief Joseph Formhals inviting him to join me on my inspection of the site during the week of December 8. I did not hear back from Mr. Formhals before or after conducting my complaint investigation.

On December 9, 2014 I arrived at the site and met with Tote Detailing Specialists Inc. (TDS) operations manager Steve McClanahan (815 483 3233) who provided necessary information and accompanied me on a tour of the facility. TDS accepts approximately 25,000 to 30,000 plastic totes annually from off site for cleaning, maintaining, reconditioning, and inspection. Damaged totes are shredded and the plastic sold for recycling. Usable totes are emptied of their heels, washed, dried, and resold. The site has a waste water treatment system (Permit J3300) issued on April 1, 2012 by the City of Joliet with an expiration date of March 31, 2015.

TDS generates the following waste streams: Nonhazardous heels, oxidizer heels, flammable heels, and wastewater treatment sludge. No product heels that would be considered acute hazardous waste are accepted at this location. Nonhazardous waste is manifested to Heartland Recycling (West Cook Transfer Station) located in Forest View for disposal. Six totes of oxidizer waste have been accumulating on site since February. Mr. McClanahan stated that he will be asking customers about the possibility of reusing this material in its current form. I informed him that TDS needs to make a hazardous waste determination for this material as it has not been reclaimed to date. No flammable waste is currently on site. Mr. McClanahan stated that flammable heels represent a small percentage of incoming material and that he could introduce this, and small amounts of oxidizer waste, into the wastewater treatment system. I explained the need for proper labeling and dating during accumulation should either waste stream come up hazardous.

On December 11, 2014, I left a message with company president Brad Noyes (210 904 5078) requesting recent manifests and additional site information.

On December 15, 2014, I spoke with Mr. Noyes. He stated that a company had come to the site on December 12, 2014 to obtain samples of the oxidizer totes to make hazardous waste determinations. He is also contacting Ecolab to determine if they could reuse the material as it originated from their Joliet facility. Mr. Noyes averred that he would forward copies of signed manifests to me via email.

On January 15, 2015, I spoke with Mr. McClanahan regarding the status of the waste determination. He informed me that the totes were approximately 29% hydrogen peroxide and that TDS was able to find a customer located in Texas that was able to utilize the material for its intended use. Mr. McClanahan stated that the material was shipped off site yesterday and that he would forward me copies of all paperwork associated with its disposition.

On January 15, 2015, TDS national sales manager Thomas Toy (325 370 8899) contacted me regarding the submittal of the aforementioned information. Mr. Toy averred that he would have the requested paperwork emailed to me by January 20, 2015.

On January 20, 2015, I received the required paperwork from Mr. McClanahan documenting the shipment of hydrogen peroxide to Servco Chemical located in Lubbock, TX for reuse/sale as product.

No further action by the Bureau of Land is necessary at this time.

Grigalauski, Chuck

From: Grigalauski, Chuck
Sent: Wednesday, November 05, 2014 2:00 PM
To: Retzlaff, Mark
Cc: Haennicke, James
Subject: RE: Complaint!! FW: 500 Oak Leaf-Jolie Illinois Tote Detailing Specialists Inc.

I'll probably assign this to James for December 2014. We can certainly go look at the operation with others.

From: Retzlaff, Mark
Sent: Wednesday, November 05, 2014 1:54 PM
To: Grigalauski, Chuck
Subject: Complaint!! FW: 500 Oak Leaf-Jolie Illinois Tote Detailing Specialists Inc.

Hi Chuck,

This site has had ongoing issues and the locals have questions about how it's regulated. The Chief with Joliet FD, is requesting a joint inspection from IEPA, OSHA and IEMA.

I'm not sure that IEMA performs those type of inspections but I can check. Is this something you guys would do?

Let me know and I will reach out to the other Agencies and see what can be done.

Mark R.

From: Formhals, Joseph CHIEF [mailto:jformhals@jolietcity.org]
Sent: Wednesday, November 05, 2014 1:46 PM
To: Retzlaff, Mark
Cc: Mackley, David R; Offermann, Frederick M CAPT
Subject: 500 Oak Leaf-Jolie Illinois Tote Detailing Specialists Inc.

Mark

On Wednesday October 1, 2014, the Joliet Fire Department responded to a Hazardous Materials call at Tote Detailing Specialists Inc. 500 Oak Leaf Ct in Joliet (Run #14849). Once under control, the scene was later turned over to SET Environmental out of Wheeling Illinois (Mark Parquette, mparquette@setenv.com).

On Monday November 3, 2014, I met with the Operations Manager of the factory, Steve Mcclanahan, to do an after action report of what had transpired that day. The warehouse has locations here and in San Antonio, and employs 14 workers on a single shift. They clean, repair and sell 250 gallon plastic totes. The totes come in with 1" or less of product ("Heels") and are considered "Recra Empty." The containers come in from all over the Midwest, and can contain just about anything in them. Steve stated that lately, they are getting in a lot of lubricants from the fracking industry. Those products that are not peroxides, oxidizers, and acids, are then combined into one large 250 gallon tote. Those are then set aside for a waste hauler to come in and pick up. Steve stated that containers with residual peroxides, oxidizers and acids are only combined with other peroxides, oxidizers and acids.

The day of the incident, an employee was combining oxidizers into one empty tote. The problem was, the tote that the employee thought was empty, actually had some dry residual product on the interior of the container, and that product caused a reaction when the oxidizer was added.

In touring the factory, I do not feel that proper safety requirements are being adhered to. There is no 704M marking on the outside of the building. Employees have had no hazardous materials training. I don't believe the company reports to the Local Emergency Planning Commission (LEPC). The work flow within the warehouse seems very unorganized. There is no one on site with a background in chemistry, to monitor and supervise the combining of products. The employees do not appear to be wearing the proper PPE. There is a grinder onsite that employees use to grind up unwanted totes. I am not sure if it has the proper safety guards in place to prevent an accident. There does not appear to be any type of inventory of product in the warehouse. I don't think that staff would be able to tell responders what is exactly in the warehouse at any given time. There are no legible placards on many of the containers, and I did not see any MSDS sheets readily available for responders or staff. The empty totes were being stacked all the way to the ceiling, which looked like an accident waiting to happen. The warehouse also has a license to treat water, but I am not confident that it is being done correctly.

I would recommend a tour of the facility by IEMA, IEPA, and OSHA to see if there are any violations occurring. We have had a couple of other incidents at this property over that last few years, and with its close proximity to a residential area, the next incident could be disastrous. Can you assist in setting up meetings with these other agencies?

Thanks

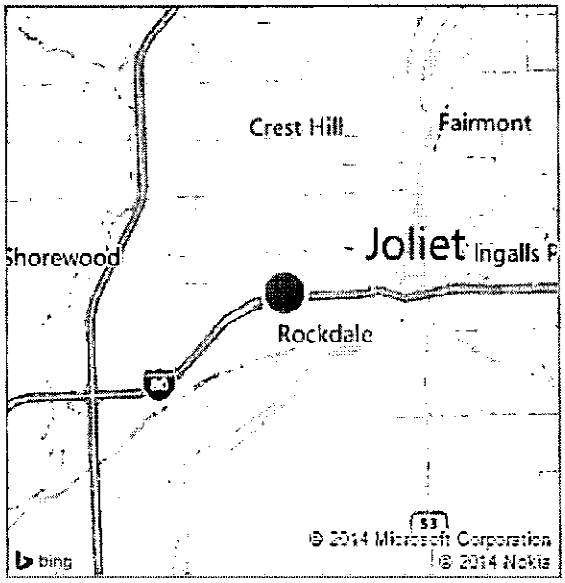
Joe Formhals

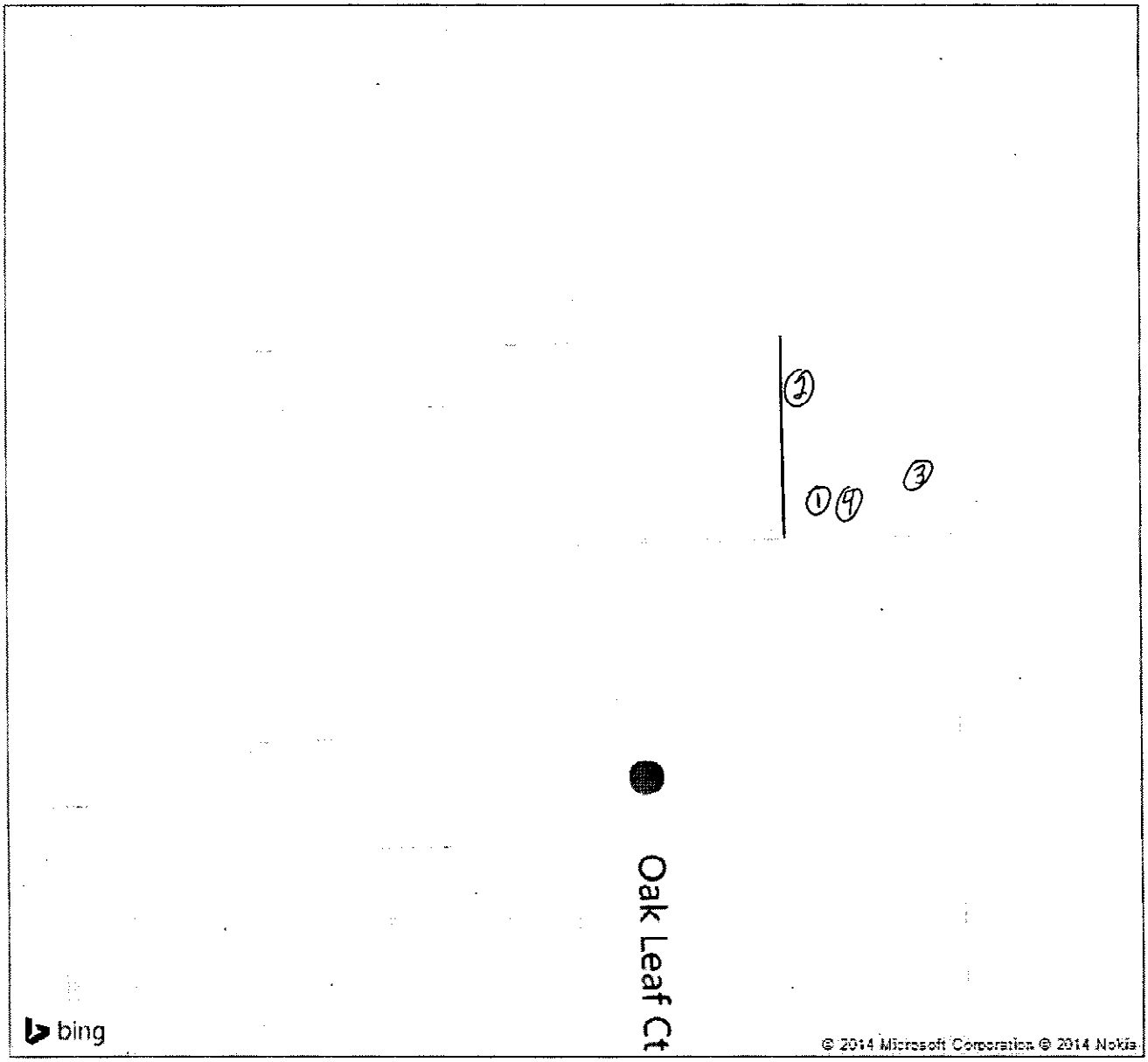
bing Maps

500 Oak Leaf Ct, Joliet, IL 60436

1970455553- Will
Tote Detailing Specialists Inc
12-9-14
#- photo

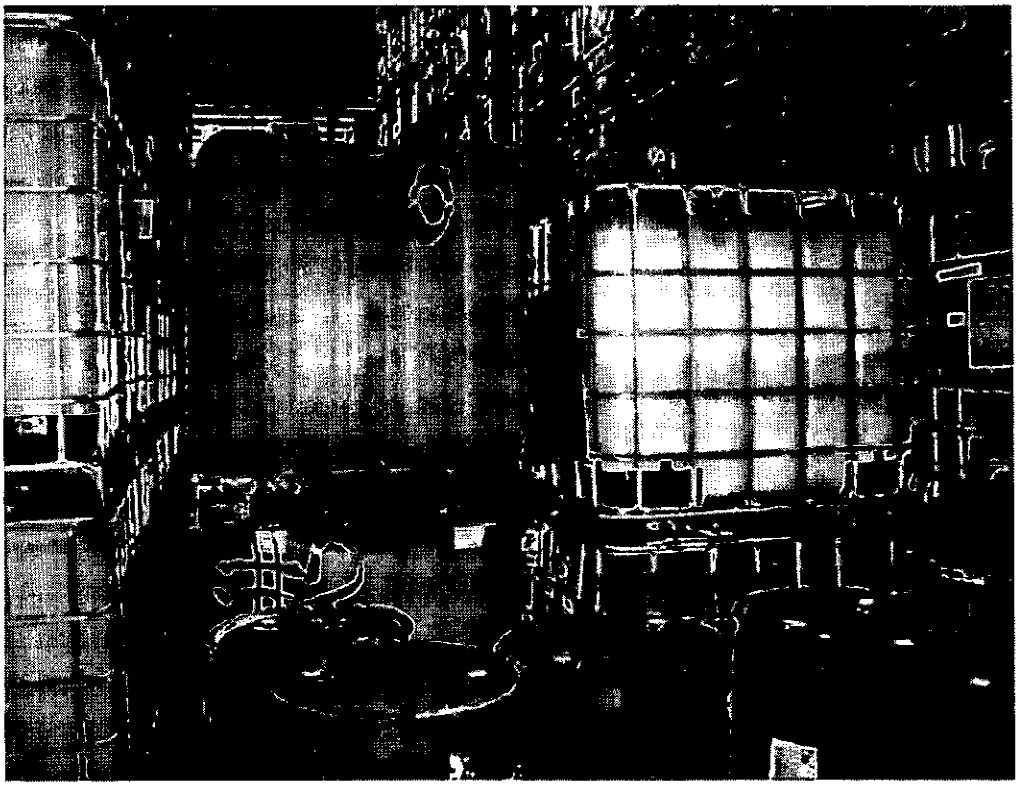
On the go? Use **m.bing.com** to find maps, directions, businesses, and more





DIGITAL PHOTOGRAPHS

File Names: 1970455553 -12092014-[Exp. #].jpg

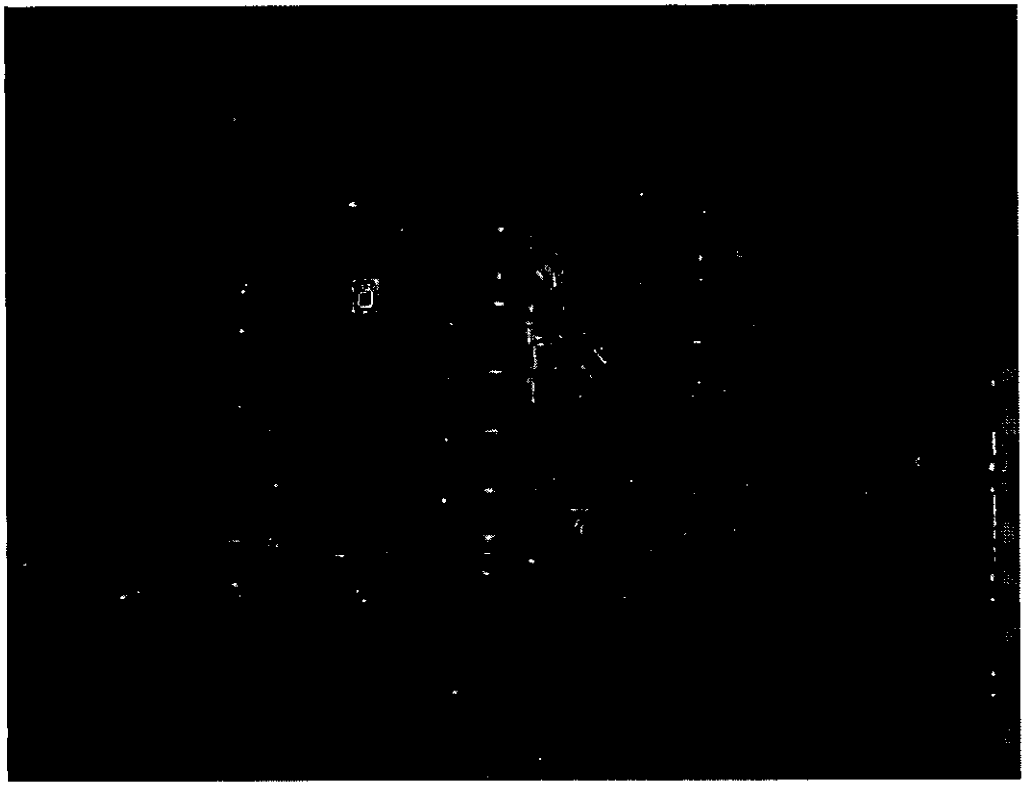


Date: 12-9-14
Time: 10:30- 12
Direction: N
Photo by: James Haennicke
Exposure #: 1
Comments: Totes of nonhazardous waste

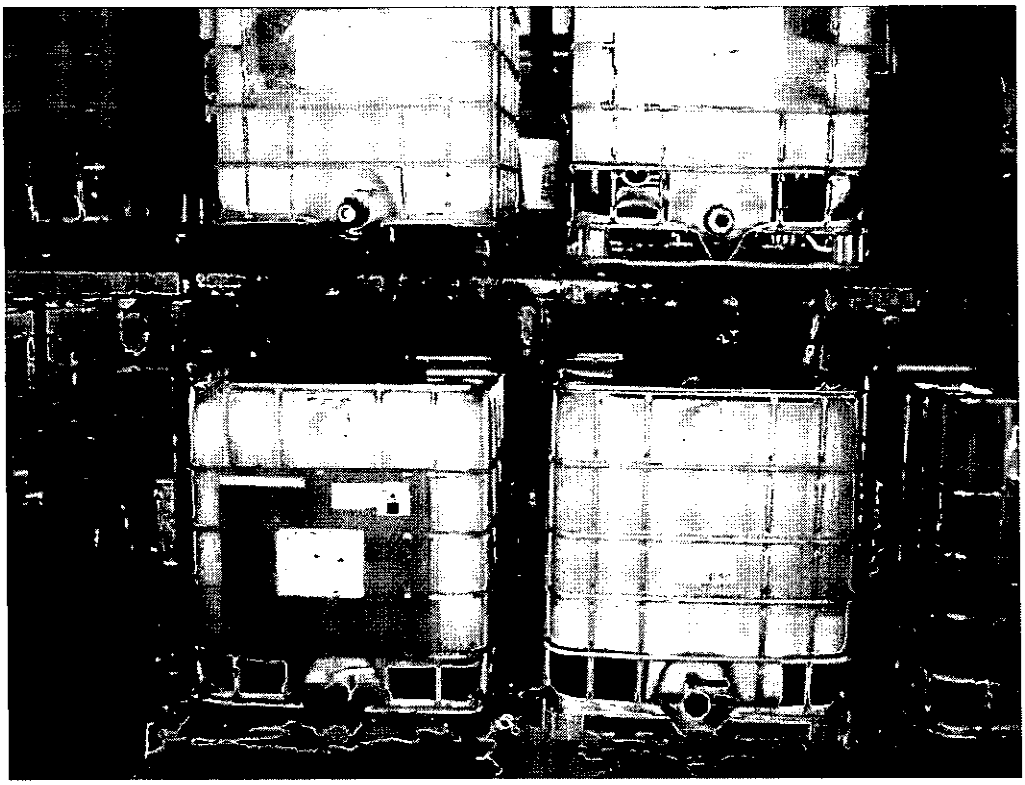
Date: 12-9-14
Time: 10:30- 12
Direction: NE
Photo by: James Haennicke
Exposure #: 2
Comments: Totes of hydrogen peroxide waste

DIGITAL PHOTOGRAPHS

File Names: 1970455553 -12092014-[Exp. #].jpg



Date: 12-9-14
Time: 10:30- 12
Direction: SE
Photo by: James Haennicke
Exposure #: 3
Comments: Totes of wastewater treatment sludge



Date: 12-9-14
Time: 10:30- 12
Direction: E
Photo by: James Haennicke
Exposure #: 4
Comments: Collection of nonhazardous waste heels from incoming totes

Badger Disposal of Milwaukee
5611 W. Hernlock St
Milwaukee, WI 53223
P 414-760-9175
F 414-760-9189
www.badgerdisposal.com

BADGER DISPOSAL
Badger Disposal of WI, Inc.

"Wisconsin's Best Waste Disposal Company"

1-16-15

John,

The sample you gave us on 12-15-14 from Tote Detailing showed there was 28.6% hydrogen peroxide in the solution. We didn't test for any other constituents because our option was for disposal.

Regards,

Mike Fugate

BILL OF LADING

BOL Number: 20796548

SHIP FROM

Name: Tote Detailing Specialist Inc
Address 1: 500 D. Oak Leaf Ct
Address 2:
Address 3:
City/State/Zip: JOLIET, IL, 60436
Frank Ja P: 800-349-9548 Ext. F:
Stop Notes:

Carrier: FedEx Priority
Pro #:

BAR CODE SPACE

Pick up date: 1/14/2015
Trailer #: Seal #

SHIP TO

Name: Servco Chemical
Address 1: 2701 E 66th St
Address 2:
Address 3:
City/State/Zip: LUBBOCK, TX, 79413
Receiving P: 806-368-5060 Ext. F:
Stop Notes:

REFERENCE INFORMATION

1154-

FedEx Freight

342984431-6

THIRD PARTY FREIGHT CHARGES BILL TO

Echo Global Logistics
600 W. Chicago, Suite 725
Chicago, IL 60654 UNITED STATES

Freight Charge Terms:	Carrier Acct #:
Prepaid [X] Collect [ ] 3rd Party [X]	Quote ID: F4562578CM10

Special Instructions:
DO NOT STACK
QUESTIONS CALL ALEX :678-412-6433
Quote ID# F4562578CM10
See Shipper and Consignee Instructions

ECHO is not liable for any accessorial charges unless pre-approved by Echo or noted on this bill of lading.

LTL or Partial Only:
# of Pallets: 5 Pallet Type: Skid Spots: Stackable: No
Pallet Dimensions: Other L: 46 W: 40 H: 54 inches

Shipper Instructions
Pickup #:
Loc Type:
Special Services:
- Hazardous Material

Consignee Instructions
Delivery #:
Loc Type:
Special Services:

CARRIER INFORMATION

HANDLING UNIT QTY	HANDLING UNIT TYPE	PACKAGE QTY	PACKAGE TYPE	WEIGHT	HM (X)	OD (X)	COMMODITY DESCRIPTION	LTL Only NMFC#	LTL Only CLASS
0		5	Tote	10975			Hydrogen Peroxide Aqueos Solution 20-40%, 5.1(6), PG II UN2014	-	
0		5		10975			GRAND TOTAL		

When the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows: "The agreed or declared value of the property is specifically stated by the shipper to be not exceeding _____ per _____."

COD Amount: $_____
Fee Terms: Collect: [ ] Prepaid: [ ]
Customer check acceptable: [ ]

NOTE Liability Limitation for loss or damage in this shipment may be applicable. See 49 ■ 14706(c)(1)(A) and (B).

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. (See cod. 7)

_____ Shipper Signature

SHIPPER SIGNATURE / DATE
This is to certify that the above named materials are properly classified, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.
Shipper: _____ Date: _____

Trailer Loaded:
[ ] By Shipper
[ ] By Driver

Freight Counted:
[ ] By Shipper
[ ] By Driver/Pallets said to contain
[ ] By Driver/Pieces

CARRIER SIGNATURE / PICKUP DATE 1-15-15
Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the Department of Transportation emergency response guidebook or equivalent documentation in the vehicle.
FXE X3738 Date: _____

5 TOTES

From: Jon A. Hogg [jhogg@servcochemical.com]
Sent: Tuesday, January 20, 2015 8:28 AM
To: Thomas Toy
Subject: Peroxide

Good Morning

Servco will be using/selling the hydrogen peroxide Tote Detailing sent in its current state.

Thanks!

Jon Hogg
Sent from my iPhone