

IMACC Corporation

IBC and Drum Acceptance Procedure – Residual Materials

1.0 Purpose

- To ensure that all containers with hazardous loadings received by IMACC Corporation meet the requirements of 40 CFR 261.7 and IMACC Corporation IBC Acceptance Policy dated January 5, 2001, (attached for reference).
- To ensure that containers received with excess non-hazardous loadings are properly managed and not introduced into the cleaning process.

2.0 Scope

This procedure applies to all empty containers and IBC's received by IMACC Corporation.

3.0 Procedure

- 3.1** Before an empty container can be accepted, IMACC environmental personnel will complete a review of the residual contents.
- 3.2** All customers will be provided with an empty container certification prior to acceptance of containers at the facility. The certification will refer to the current version of the *Container and IBC Acceptance Policy*. The certifications will clearly state that IBC's containing excess residuals will not be unloaded and will be returned at the customer's expense. A customer-signed copy will be maintained on site. An "e-signature" will also be accepted if the form is completed through the IMACC Corporation web site.
- 3.3** Containers that have RCRA, P-Listed, or other materials that are listed on the IMACC Corporation "Non-accept List" will be returned to the shipper or left on the delivery vehicle.

4.0 Handling of Non-conforming Containers

- 4.1** It is the position of IMACC Corporation that containers that contain product have been shipped by mistake to the facility.
- 4.2** Receiving personnel will immediately notify their supervisor that a non-conforming container has arrived onsite.
- 4.3** The supervisor will initiate a "Non-conforming Container Notification / Rejection Notice".
- 4.4** The supervisor will then notify one or more of the following: Plant Manager, Environmental Manager, Customer Service Center. The Customer will be notified directly by phone and by faxed copy of the filled out rejection notice.
- 4.5** The non-conforming container may be set aside in a designated hold area while the balance of the delivery vehicle is unloaded.

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- 4.6 If possible, a decision regarding the disposition of the non-conforming container will be made before the delivery vehicle leaves the facility. It is preferred that that container is returned with the delivery vehicle.
- 4.7 Non-conforming containers will not be introduced into the process, and will not be stored in the hold area for longer than 30 days before being returned to the emptier at their expense.
- 4.8 Non-conforming containers may be returned with the next outgoing shipment of cleaned containers with approval of IMACC Corporation Management personnel.
- 4.9 A completed “Non-Conforming Container Exception Report” will be attached to the container or group of containers”.
- 4.10 A copy of the form will be maintained onsite in a logbook controlled by the Plant Manager and / or the Environmental Manager.
- 4.11 The log will be reviewed periodically to determine if there are repeat occurrences.

5.0 Policy for Non-conforming Containers That Are Not Returned

While it is always preferable to not accept, or return non-empty containers, exceptions **can only be made for nonhazardous ladings**. When necessary, the following shall apply.

- 5.1 A setup, storage and handling fee of \$150.00 may be applied for each incident. An incident is defined as the total number of nonconforming containers received on a single trailer.
- 5.2 Residual material will be charged at a rate of \$7.00 per gallon for disposal at a IMACC Corporation approved disposal facility. Appropriate waste profiles will be established for residual materials.
- 5.3 A copy of the rejection notice will be faxed to the customer notifying them of the fees.
- 5.4 If it is later decided that the container will be returned to the customer, the fees outlined in 5.1 and 5.2 above will be waived provided the container is removed from the site by the last working day of the calendar month it was received.

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6.0 Procedure for Other Containers Shipped in Error

This procedure addresses IBCs shipped to the facility in error by the shipper / emptier.

- 6.1** Notification of the will be made at the time of receipt using the “Non-conforming Container Notification / Rejection Notice”.
- 6.2** A storage time limit of 30 days from notification date has been established.
- 6.3** After 30 days the IBC may be dispositioned at our discretion.

7.0 Definitions

Excess Residue – Hazardous Ladings: Containers that do not meet the definition of empty, as found in 40CFR 261.7.

Excess Residue – Nonhazardous Ladings: For IBCs, material in excess of the well area at the valve, 1 inch or less is acceptable for viscous, hard to remove material. If material readily flows from the valve when it is opened, and the IBC is on a flat, level surface, the unit is not considered empty.

For drums, non-pourable or viscous material. in excess of 1 inch.

Other Containers Shipped in Error: These are containers that the shipper has mistakenly shipped, (e.g. – stainless steel IBCs).

Hazardous Ladings: Materials that are regulated by: 1- DOT, 2- if declared a waste would be RCRA regulated, 3- are otherwise restricted by IMACC Corporation “Non-Accept” list.

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