



## Non-Bulk Container and IBC Acceptance Policy

### Circulation:

<b>Current and Prospective Account Managers</b>	<b>Drum Emptier Training Managers</b>
<b>Location Managers</b>	<b>Customer Service</b>

### Empty Container – Federal Requirements

**40 CFR 261.7** - For bulk and non-bulk containers, IMACC requires the EPA defined degree of empty found in 40 CFR 261.7. With regard to most regulated residues, EPA's 40 CFR 261.7 states, a container is empty if:

- (i) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating, **and**
- (ii) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container or inner liner, or

(iii)(A) No more than 3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is less than or equal to 119 gallons in size; or

Empty Non Bulk Container

**Non Bulk**



(iii)(B) No more than 0.3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is greater than 119 gallons in size.

**IBC's - Bulk**

Empty Bulk Container (IBC)





## Non-Bulk Container and IBC Acceptance Policy

**49 CFR 173.29 (a) Empty packagings** - IMACC requires the packaging preparation and the degree of empty required by DOT. The following states the requirements:

(a) General. Except as otherwise provided in this section, an empty packaging containing only the residue of a hazardous material shall be offered for transportation and transported in the same manner as when it previously contained a greater quantity of that hazardous material.

(i.e., all openings must be closed, and all markings and labels must be in place).  
Additionally:

***This means all labels and closures (plugs, covers, rings, caps, valves, etc.) are in place and assembled, and the drum is to have the integrity to contain the material as if full (no holes, rips or tears).***

**For Non-Bulk Containers** (maximum capacity of 119 gallons) a DOT shipping paper is not required for transportation of any empty drum for reconditioning via contract or private carrier. DOT placarding is not required for vehicles carrying empty containers.

**For Bulk Containers** - previously containing hazardous materials - (capacity exceeding 119 gallons) a DOT shipping paper is required for transportation of any IBC for reconditioning via contract or private carrier. DOT placarding is required for vehicles carrying empty bulk containers.

### **49 CFR 172.203(e) – When Shipping Papers are Required**

Empty Packagings. (1) The description on the shipping paper for a packaging containing the residue of a hazardous material may include the words "RESIDUE: Last Contained \_\_\_\_\_" in association with the basic description of the hazardous material last contained in the packaging.

**Additional parts of 173.29 may apply.**

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## Non-Bulk Container and IBC Acceptance Policy

The following illustrates DOT hazardous materials and Other Materials is generally approved for acceptance:

Packagings with the following labels or placards:



Paint and Solvents



Flammable Solids



Common Acids and Alkaline



Common Acids and Alkaline



Miscellaneous Hazardous Materials



The Shipping Papers must contain a signed statement from the emptier that the packagings are emptied in accordance with 40 CFR 261.7 (i.e., the IMACC Container Receiving Record) or a label such as:





## Non-Bulk Container and IBC Acceptance Policy

Generally approved for acceptance:

### Non Hazardous Materials

Containers with non-hazardous ladings (not marked with the above labeling), not regulated by DOT or as follows are generally approved for acceptance. However, if these packagings are not drip dry empty, a heal agreement is required. See the Plant Manager if you have any questions.



Unused Virgin Oil, Lube Oil  
And Grease Drums

Depending on an evaluation by IMACC Environmental personnel, exceptions can be made to the non-accept list and never accept list on a case-by-case and chemical specific basis and must be in writing. Consideration for acceptance can be made based on the following:

- The percentage of the chemical in the residue is low and over-conservative labeling by the manufacturer is evident.
- How much of the residue is physically present (e.g., methanol may be fully evaporated and not present in the container), or
- If the chemical residue actually decontaminates the container by its cleaning properties.



## Non-Bulk Container and IBC Acceptance Policy

Not approved for acceptance:

Material Safety Data Sheets which state the packagings are not to be reconditioned or reused or must be [triple rinsed](#) before offering to a reconditioner.

Poisons, Pesticides, Infectious Substances and Agricultural Chemicals - The following packagings may not be transported by IMACC contract drivers or received at IMACC, LLC without expressed written approval.



Look for the word TOXIC on a Poison Label or Placard as follows:  
(c) For a package containing a Division 6.1, Packing Group III material, the POISON label specified in § [172.430](#) may be modified to display the text "PG III" instead of "POISON" or "TOXIC" below the mid line of the label.

Exceptions to poison drums are drip dry empty Methanol (Methyl Alcohol) drums and drums which are [triple rinsed](#) and approved for acceptance in writing. This category includes:

- Poisons - Class B (Old DOT Designation)
- Poisons – Hazard Class 6.1 - Packaging Group II (Skull & Cross Bones)
- Poisons - WHMIS (Canada) Skull & Cross Bones

Packaging Group III Poison drums (previously having a St. Andrews Cross and Wheat DOT Label) require the submittal of the MSDS and written approval before acceptance.

[Triple rinsed](#) drums will be marked as follows:





## Non-Bulk Container and IBC Acceptance Policy

Not approved for acceptance:

**Radioactive** - The following packagings are not expected to be available for cleaning or reconditioning. These will never be transported or received.



The following is a list of residues IMACC, LLC never accepts unless by written exception:

### Agricultural / Biological Chemicals

- Pesticides
- Herbicides
- Biocides
- Insecticides
- Fungicides
- Rodenticides

Cyanide or Cyanide Compounds

Dioxins

Parathion (any percentage)

PCB's (Polychlorinated Biphenyls)

Poisonous by Inhalation Explosives 1.1, 1.2, 1.3, 1.4, 1.5 and 1.6



Oxidizers



Organic Peroxides



Ladings where the MSDS specifies the container is not to be reused; triple rinsing or equivalent cleaning methods may be allowed if specified on the MSDS.



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Other non-accept materials lists without triple rinsing and written consent include:

- **The Federal List Regulations for Acute Hazardous Waste** - 49 CFR Section. 261.31, 261.32, or 261.33(e) – Includes P Listed Wastes
- **IMACC, LLC Historical Non Accept List**

111-Trichloroethane  
Acrylonitrile  
Alkyl Chloride  
Ammonia Perchlorate  
Ammonium Fluoride  
Aqua Ammonia (any percentage)  
Benzene  
Benzoyl Chloride  
Butylacrylate  
Carbon Tetrachloride  
Chlorinated Phenols  
Chloroform  
Chloroprene  
Ethyl Chloride  
Ethylene Dichloride  
Formaldehyde (any percentage)  
Hexachlorobenzene  
Hydrofluoric Acid (any percentage)  
Hydrogen Chloride  
Inerteen 70 - Monsanto Lined Drums  
Methyl Chloroform  
Methylene Chloride (any percentage)  
Penta (Pentachlorophenol)  
Perchloric Acid  
Perchloroethylene (Perc)  
P-Listed Wastes (Triple Rinsed Requirement)  
Potable Coagulant  
Silicon  
Sodium Bisulfide  
Toluene Diisocyanate (TDI)  
Trichloroethylene  
Triethylamine  
Vinyl chloride  
Vinylidene Chloride



## Non-Bulk Container and IBC Acceptance Policy

### Triple Rinse Data Requested for Acceptance

If Triple Rinsing is required for acceptance, please forward a copy of the triple rinse procedure, work instructions, training and triple rinse label procedures. Please describe rinsate disposal procedure and the status of any permit needed to triple rinse or discharge. Please describe the degree of decontamination achieved by triple rinsing in the following context:

- 1) Minimum Triple Rinse Criteria - The container or inner liner has been triple rinsed using a solvent capable of removing the waste and all pourable residues have been removed from the container. CCR Title 22 66261.7 (d) applied to all hazardous materials.
- 2) Label Removal Criteria - The packaging is sufficiently cleaned of residue and purged of vapors to remove any potential hazard; including Hazard Categories Under Criteria of SARA Title III Rules (40 CFR Part 370) - Immediate (Acute) Health. 49 CFR 173.29(b)(2).
- 3) Label Removal Criteria - Any material contained in the packaging does not meet the definitions in 40 CFR § 171.8 of this subchapter for a hazardous substance, a hazardous waste, or a marine pollutant. 49 CFR 173.29(b)(3).
- 4) Empty Container Criteria - The degree of empty required by the California Contaminated Container (empty container) standard and DOT requirements are met. CCR Title 22 66261.7 (b).

This will help us disposition the drums, and assist us in an approval decision.