



## DRUM ACCEPTANCE POLICY

### 1. DRUMS MUST BE EMPTY

We will accept no drums that are not empty. We understand that some minor residue of the drum's prior contents will remain after normal emptying. How much is acceptable is decided by EPA's definition of an "empty" container (40 CFR 261.7). This regulation says: first, that the drum is as empty as it can be gotten using "...the practice commonly employed to remove materials from that type of container, e.g. pouring, pumping...", but second, that in no event may there be more than one inch (or 3 percent by weight) of residue left in the drum.

Note that different types of products require different degrees of emptying (solvents vs. paints, for example). Note also that the one-inch rule applies only as an outside limit; IT DOES NOT AUTHORIZE ALL DRUMS TO HAVE ONE INCH OF RESIDUE. Drums must be as empty as they can be gotten using normal emptying methods. With all but a very few products (like tars, etc.), this will result in far less than one inch of residue. As a practical matter, the rule means that if an opened drum is turned over, only a few drops of product will come out. The drum should be "drip dry".

A full copy of the EPA empty drum regulation may be found in the Responsible Container Management Pamphlet "DISPOSITION". A copy of this is enclosed.

### 2. DRUMS MUST NOT HAVE CONTAINED "ACUTELY HAZARDOUS CHEMICALS"

The EPA has published - at 40 CFR 261.33 (e) - a list of chemicals whose residues are considered to be "acutely hazardous". A copy of the list is printed in Schedule A. Further, certain materials have been registered pursuant to the Federal Fungicide, Insecticide and Rodenticide Act, 42 U.S.C. 136 et. seq. and 40 CFR Sec. 180. A copy of the registered materials list is printed in Schedule B. We will not pick up these drums under any circumstances.

### 3. DRUMS MUST BE PROPERLY PREPARED FOR TRANSPORTATION

The D.O.T. requires that an uncleaned empty drum must be shipped:

- a) with "all openings including removable heads and filling and vent holes tightly closed...", and
- b) with the original label (describing the drum residue) legibly in place (49 CFR 173.20 A)

There is no D.O.T. placarding requirement for vehicles transporting empty drums (49 CFR 173.29). Also, empty drums picked up by our trucks (or delivered by your trucks or private and contract carriers to our plant) are exempt from the D.O.T. shipping paper requirement, because such drums are "collected and transported for...reconditioning and reuse" (49 CFR 173.29).

#### 4. CERTIFICATION OF THESE REQUIREMENTS BY SHIPPER

We pick up drums only after the shipper (on every load) certifies compliance with the above requirements by executing an "Empty Drum Certification" form which we provide. The importance of this certification is described in the Responsible Container Management Pamphlet: "EMPTY DRUM CERTIFICATION". A copy of the pamphlet, which includes the text of the certification, is enclosed.

#### 5. INSPECTION

Drums are inspected at our receiving docks. Drums vary considerably in their reuse value due to many factors:

- (1) gauge of metal of construction
- (2) D.O.T. specification status
- (3) nature of residues of previous contents, difficulty of removal, and steps necessary to handle safely and dispose of these residues
- (4) degree of damage and overall condition

Some containers are not acceptable, at all, unless a specific arrangement is agreed upon between the customer and Meyer Steel Drum, Inc. for disposition:

- (1) any container under 30 gallons in size
- (2) containers which are not of full steel construction, plastic drums, fiber drums, plastic flanges etc.
- (3) drums which house an inner packing of plastic or other construction, D.O.T. 37M drums etc.