



HOW CLEAN MUST AN IBC BE FOR RECYCLING?

Preparing empty containers for Recycling

RCRA Empty

- Confirm container meets RCRA empty criteria
- Open valve allow all flowable liquid to drain

Labels

- Confirm labels are intact
- Confirm placards intact for hazardous materials

Closures

- Close valve
- Close cap - hand tighten

No Spills

- Confirm no material spilled on container exterior
- Confirm no leaks from container that may spill during transport



Focus on “RCRA empty” – Regulatory Definition

USEPA defines an empty bulk container in 40 CFR 261.7 (a more stringent definition applies to containers with residues of acutely hazardous waste/”P-listed” materials)

- 1. 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 no more than one inch of residue remains on the bottom of the container;**
- 2. for bulk containers >119gal: no more than 0.3% by weight of the total capacity of the container remains in the bottom**
- 3. for non-bulk containers <119gal: no more than 3% by weight of the total capacity of the container remains in the bottom**



“Residue last contained” – waste classification

Non Hazardous waste “RCRA”

1. Not regulated by DOT
2. Hazardous material regulated by DOT
 - Ensure BOL is compliant, placard and labels affixed to container
3. Non empty containers
 - Work with TSDf to coordinate pick up of residual material.
 - Work with organization willing and capable to accept non empty containers
4. Rinsed containers
 - Lowest cost for industry
 - Increases value of IBC for generator

Hazardous waste “RCRA”

1. 2-4D (RCRA empty)
 - Ship with BOL compliant with DOT
 - Ensure recycler is capable of managing hazardous waste
2. 2-4D (not RCRA empty)
 - Site required to obtain permanent or temporary hazardous waste generator ID# and comply with all associated requirements
 - Manifest is required for shipment
 - Ship material to Hazardous Waste approved TSDf for proper disposal. (\$\$\$)



Resources/Organizations that can help

1. Industry Associations

- TPSA
- CropLife
- ACRC
- EPA

2. Organizations

- Ag Chemical manufacturers
- Tri-Rinse, INC
- NCG/Mausser Group
- Schutz
- ITEH



Thank You!

1. Questions?
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