

# ***ACRC/AAI Minibulk Recycling Pilot Project***

***Ron Perkins***

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***Ag Container Recycling Council***

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# Pilot Program Objective

- **Determine the future role of ACRC in the recycling of minibulks that will not comply with new regulations for refillable containers included in the Container & Containment Rule**



**ACRC**  
Ag Container Recycling Council

# The Target



RON PERKINS

[www.acrecycle.org](http://www.acrecycle.org)

# Participants

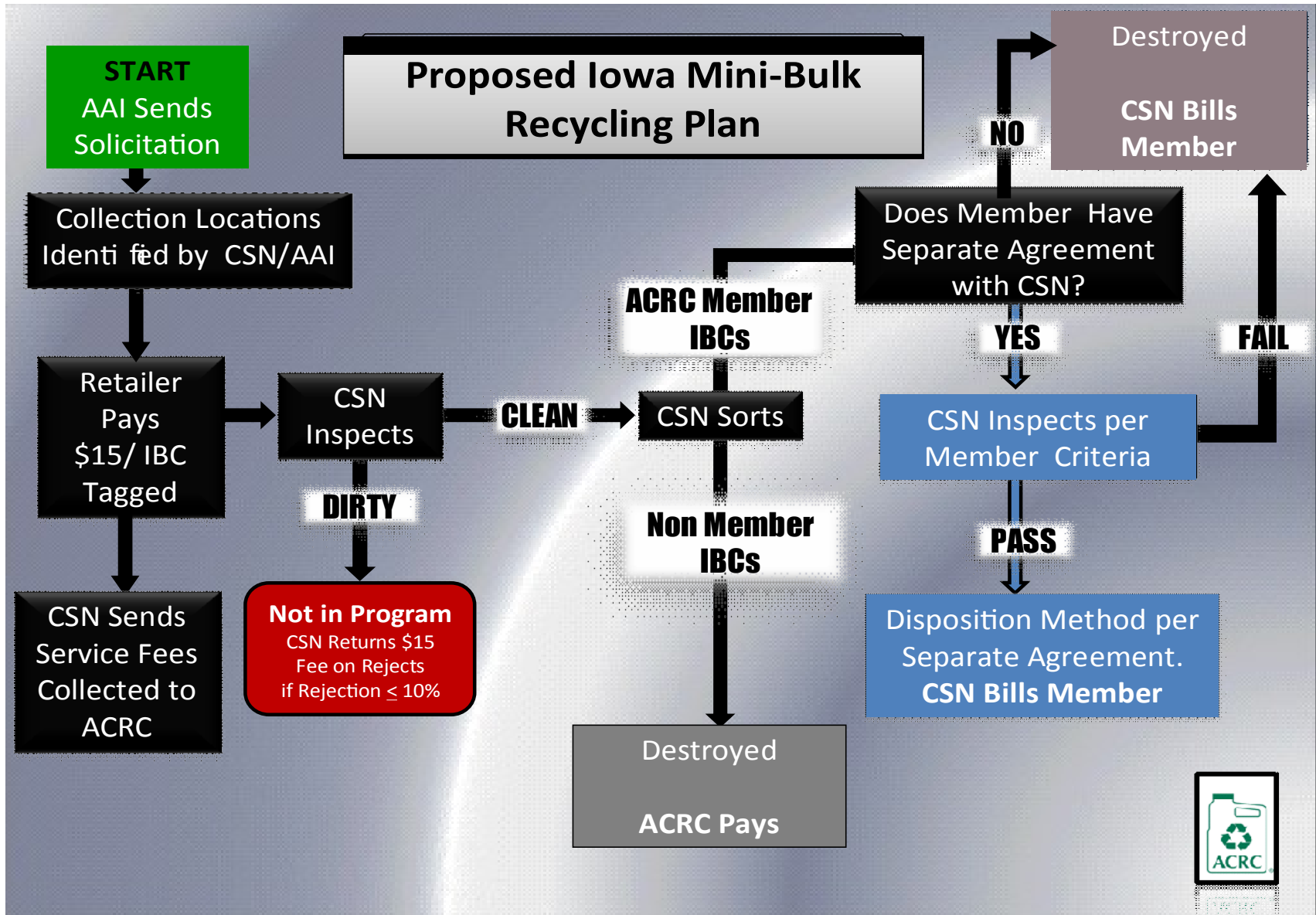
- **ACRC**
- **Agri-business Association of Iowa (AAI) staff and membership**
- **Ken Root- Root Communications**
- **CSN, LLC**
- **ACRC member companies**

# Action Step Summary

- 1. Develop implementation plan**
  - A. Funding**
  - B. Promotion**
  - C. Collection/recycling**
- 2. Promote and solicit participants**
- 3. Schedule & perform container inspection**
- 4. Schedule & conduct container collection**
- 5. Process containers; i.e. cut up; grind; wash, etc**
- 6. Market recovered plastic to acceptable end uses**



# Pilot Program Process Flow





## Agribusiness Association of Iowa

900 Des Moines Street • Des Moines, Iowa • 50309-5549

(800) 383-1682 • (515) 262-8323 • (515) 262-8960 FAX

[www.agribiz.org](http://www.agribiz.org)

July 9, 2010

Dear AAI Members:

Iowa has been selected by the Ag Container Recycling Council (ACRC) for the launch of a major pesticide container recycling program. The project will encompass up to 6,000 Intermediate Bulk Containers (IBCs). These IBCs are also known as Mini-Bulks or Shuttles and range in size from 56 to 330 gallons. A large number of these containers will become unusable in the near future, as they will not be in compliance with the U.S. EPA Pesticide Container and Containment Rule and regulations that take effect on August 16, 2011.

In cooperation with the manufacturers of crop protection products, the Iowa IBC Recycling Project is working with Container Services Network, LLC (CSN) to pick up containers that have been inspected and approved for recycling. There will be a fee of \$15.00 for each container inspected for recycling. This fee is based on the cost of conducting the program and the unrecovered cost of recycling "orphan" containers. Caged plastic containers (surrounded by a metal frame) as well as "asset" tanks both may be recycled, if properly cleaned. No metal or fiberglass containers may be included.

**Total scope of this project is 6,000 containers. First come, first served. The process to recycle your containers is straightforward.** Please read the enclosed brochure: "Rinsing and Cleaning Mini-Bulk Containers." As you perform the rinsing process, please do so on a containment pad and dispose of liquid properly. If you have questions about your containers, call Gary Glickman with CSN at 866-225-6629 or email: [gglickman@containerservicesnetwork.com](mailto:gglickman@containerservicesnetwork.com).

**To enter the program to recycle Intermediate Bulk Containers:**

1. Complete the enclosed participation form for each location where IBCs are stored.
2. Send by fax, or scan and email, to CSN. (Do not mail)
3. Only the respondents will be contacted by CSN to arrange a date and time for inspection and pick-up.
4. The process of container inspection, billing, transportation and recycling will be completed by CSN inspectors working directly with your company. The fee of \$15.00 per container must be paid to CSN for inspection. (A transportation fee of \$10 per container may apply to less than 39 containers at one location.)

By providing the means to comply with pending regulation and allowing you to free up valuable warehouse space taken by these unusable containers, AAI hopes this program will benefit our members. Ken Root is working with the Agribusiness Association of Iowa to coordinate communications for this project. He can be reached at our office in Des Moines at 515.262.8323.

Sincerely,

Mark Reisinger, CEO  
Agribusiness Association of Iowa



## Agribusiness Association of Iowa

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### Iowa Container Recycling Project Participation Survey Form

Name of Business:

Street Address

City

State

Zip Code

Telephone Number:

Contact Person:

Hours of Operation:

#### Instructions:

List only containers that have been cleaned to meet recycling standards.

List containers by name of manufacturer on placard. If unknown, list as "generic"

Use multiple sheets if necessary. Note location on each sheet.

Do not remove containers from this site.

Fax or mail this form to:

A representative of CNS Recycling will contact you to set up a date and time to inspect these containers. Upon successful inspection, containers will be scheduled for truck shipment to recycling center. An invoice for \$15.00 per approved container will be submitted to you and must be paid before the containers can be picked up for recycling.

Chemical Manufacturer (or if no label list as generic)	Size In Gallons	Quantity (Total # of this size)	Caged? (Y/N)
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			





Mark the container as required by the recycling program.

Remove DOT Hazmat labels.  
Keep Pesticide Panel label on container.

### Minimizing Residues & Managing Rinsate

The last time the container to be recycled is used the refiller should authorize the applicator to



remove tamper evident devices, completely rinse the container into the application equipment and

apply all pesticides according to label directions.

Review state and local environmental rules and use these (together with the label and MSDS) to identify any product that may be regulated under hazardous waste rules. Some residues may be moved to containers that are dedicated to pesticide rinsate management.

The container is not clean if strong odors or visible residues are present.



Look inside container.  
Remove liquid residue!

### If a Container cannot be cleaned

If the container has visible residue not removable via normal cleaning then it is outside the scope of an ACRC recycling program. Contact the registrant for disposal guidance.

CropLife America  
1156 15th St. NW, Suite 400  
Washington, DC 20005

## Safely Cleaning Refillable Pesticide Containers for Recycling



This guidance is intended for refillers, growers and others who have decided to recycle their refillable pesticide containers. Cleaning the container before recycling (or disposal) is the responsibility of the person disposing of the container. (40 CFR§156.156)



Sponsored by Ag Container Recycling Council (ACRC) & CLA

For more info contact:

CropLife America

1156 15th St. NW, Suite 400

Washington, DC 20005

202.296.1585

[www.croplifeamerica.org](http://www.croplifeamerica.org)

email: [runyon@croplifeamerica.org](mailto:runyon@croplifeamerica.org)

## Container Services Network

[illegible]

## OWNERSHIP

I acknowledge assumption of ownership of the containers listed above as of the date set forth above.

Signed: \_\_\_\_\_

Signature of Contractor's authorized representative

# **CSN INSPECTION CERTIFICATE FOR MINI-BULK/SHUTTLE RECYCLING**

## **COLLECTION ENTITY/SITE INFORMATION:**

Collection Entity (Name): \_\_\_\_\_

Description or Address: \_\_\_\_\_

County: \_\_\_\_\_ Town/City: \_\_\_\_\_ State: \_\_\_\_\_

Phone: \_\_\_\_\_ Site Contact: \_\_\_\_\_

I, \_\_\_\_\_, representative of the Collection Entity/Site listed above hereby certify that CSN visited the Collection Entity/Site and collected mini-bulk/shuttle(s) on the Date shown below.

Signature: \_\_\_\_\_

## **CONTAINER INSPECTION:**

Approximate weight of mini-bulk/shuttles inspected: \_\_\_\_\_ lbs.

Number of mini-bulks/shuttles collected: \_\_\_\_\_

Date mini-bulk/shuttle(s) inspected and collected: \_\_\_\_\_, 2011

## **INSPECTION CERTIFICATION:**

I hereby certify that the containers at the Collection Entity/Site identified above were inspected on the date listed above. Based on a visual examination, the collected mini-bulks/shuttles were judged to have been triple-rinsed or pressure rinsed per ANSI/ASABE S596 FEB2006 protocol. All mini-bulk/shuttle(s) have to be cut up into pieces no larger than 24" wide and are free of metal, gaskets, and any other foreign material. The blow molded HDPE will be recycled at ACRC approved end use mfg and the roto-molded HDPE will be used in the mfg of septic tanks.

Please Note:

- The base to asset tanks should be left in tact and not cut into pieces.
- Storage tanks that have not been approved by USDOT for transportation are NOT included in this program. The majority of these tanks include "cross-link" and cannot be recycled.
- The cut up Mini-Bulk/IBCs can be placed in a cut open IBC (top removed) or stacked and banded on a pallet.
- If mini-bulk/shuttles(s) received by CSN Service Center do not meet agreed CSN specifications, Collection Entity/Site agrees to take back said mini-bulk/shuttle(s) and pay all return freight charges.

Signed: \_\_\_\_\_

Print Name: \_\_\_\_\_

QUANTITY	CHEM MFG	CHEMICAL	UN SHIPPING #	UNIT TYPE





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Ag Container Recycling Council

# Participating Site



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[www.acrecycle.org](http://www.acrecycle.org)





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# Inspection



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# Inspection Certification



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# IBC Recycling



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# Pilot Project Results

- 18 ag retailers participated
- 1517 containers offered for recycling
  - Only 5 rejected as not clean
- 1370 asset tanks (91%); 132 composite IBCs (9%)
- 1115 ACRC member containers (74%); 397 “orphans” (26%)



## What We Learned

- Include both the state agribusiness association and regulatory agency
- Target local ag retailer managers; not owners
- Many local personnel not fully aware of new regulations
- \$15 fee is not a deterrent
- Getting tanks ready for recycling is not a priority for owners; sales and customer service come first!
- Be clear that only clean containers will be accepted
- Inspecting containers at the source has many benefits



# ACRC

Ag Container Recycling Council

## What We Learned (cont'd)

- There are legitimate recycling alternatives
  - Registrants
  - Composite IBC manufacturers
  - Recycling service vendors
- There are illegitimate alternatives
  - Reusing tanks for other products; e.g. used oil
  - Selling/giving tanks away for reconditioning
  - Selling tanks to local scrap dealers; mixed with other plastics
  - Landfilling







## What We Learned (cont'd)

- **Timing is everything!**
- **Allow at least two months for targeted participants to sign up and find time to make preparation a priority; set & keep deadlines**
- **There is adequate infrastructure in the “free market” to meet mini-bulk recycling needs**
- **The role of ACRC should be to work with CropLife America and USEPA in the development and dissemination of educational materials relating to the new refillable container regulations contained in the USEPA Container and**