



**Specialized Focus on AG Recycling
and Manufacturing**



**Rinsate and Returns
Step 1 - Education**



Website – www.ibcna.com/agribc



What is empty and who cares?



Three entities are
very concerned –
DOT, EPA and the
Basic Manufacturer





If it is a regulated product the DOT has its guidelines. You can read them by clicking here... 40CFR 261.7.(

http://edocket.access.gpo.gov/cfr_2002/julqtr/pdf/40cfr2

) If you are not sure if it's a regulated product check the markings of the container and the MSDS. If you are still unsure, call the manufacturer.





If it's a "P" Listed Chemical the EPA has something to say! Accordingly the container must be triple rinsed to be deemed empty. They define triple rinsing as "being triple rinsed by a solvent capable of removing the product." Once you triple rinse it, you'll need to mark the container as triple rinsed.





Don't know how to triple rinse? Give us a call

Not sure if your container previously held a "P" listed product? Click here 40CFR 261.33(e)

(

http://edocket.access.gpo.gov/cfr_2006/julqtr/pdf/40cfr2

). If you are still confused, talk to your environmental compliance team or call the basic manufacturer.





Lastly, the **Basic Manufacturer** probably has given instructions on the disposal and shipping of drums and IBCs. Many require triple rinsing before they are shipped. You'll need to check with them as well.





Here's the bottom line. You and your company are liable for whatever you ship over the road and send in to us to recycle. Take some time and do your homework. Once you do the leg work once, you'll never have to do it again.



Material is reused!





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