

Chemical distributors in North America annually use and reuse millions of industrial packagings to transport chemical products to their customers. The most widely used packagings are steel and plastic drums, as well as intermediate bulk containers (IBCs), also known as tote tanks.

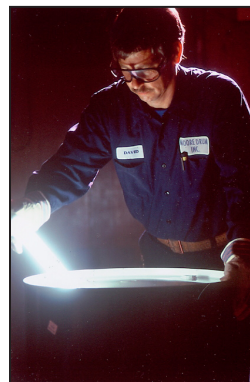
Chemical distributors have long appreciated the need for proactive environmental stewardship, including proper cleaning and reuse of chemical containers, appropriate disposal of cleaning residues, and programs that emphasize source reduction and packaging reuse. The National Association of Chemical Distributors included provisions on these topics in the Association's Responsible Distribution ProcessSM (RDP), a management practice the Association adopted in 1991.

Chemical distributor companies have a duty not only to ensure the safe delivery of chemicals to their customers, but also to help them properly manage the emptied containers. The purpose of this Bulletin is to describe the best practices associated with the proper emptying and post-use management of empty industrial packagings.

RESPONSIBLE MANAGEMENT OF EMPTY INDUSTRIAL PACKAGING

Used industrial packagings that previously contained chemicals or other hazardous materials have two environmentally acceptable fates: to be reconditioned or repaired and reused as shipping containers, or to be processed for scrap recycling. In both cases, all residues of prior contents must be removed, neutralized, and disposed of in compliance with applicable federal, state and local requirements.

Fortunately, the reusable industrial packaging industry has the equipment and the know-how to accomplish both tasks. Every year, more than 40 million steel and plastic drums, as well as IBCs, are collected, cleaned, and processed by reconditioners, thus ensuring the availability of quality packagings that are affordable, safe, reusable, and in full compliance with today's strict environmental standards.



There are several steps that package fillers and emptiers can take to ensure that their containers are safe in transportation, retain high value after emptying, and may be reused after reconditioning.

Step 1: Select a Quality Packaging

Select a package – be it a drum or an IBC – that meets all applicable standards for HazMat transportation, and is reusable. A reusable chemical packaging must meet Department of Transportation (DOT) requirements for minimum thickness, and be marked with appropriate United Nations (UN) markings.

Packagings that do not meet these basic standards can create problems for chemical distributors and their customers because their value to a reconditioner is low.

Step 2: Proper Emptying is Crucial

Companies that empty chemical packagings should be aware that an emptied packaging must be handled properly or it could become a safety or environmental liability for both the emptier and the original shipper. Strict liability standards arising from environmental laws and regulations, corporate operating standards, as well as issues related to transportation safety make emptied packaging management an area of serious concern.

Emptiers should comply fully with DOT and Environmental Protection Agency (EPA) emptiness standards. These include emptying drums and IBCs as completely as practical. In no case, even for heavy or viscous materials, may an emptier leave more than one inch of residue in a packaging. An empty packaging containing only the residue of a hazardous material must be transported in the same manner as when it previously contained a greater quantity of that hazardous material. Failure to meet this standard could result in a violation of federal environmental law.

Emptiers must ensure that all original labels and marks – especially the precautionary information – must be retained on emptied chemical packagings.

In addition, all plugs and other closures must be inserted and tightened for several reasons. First, this practice is required by regulation.

Second, packagings with improperly sealed closures may leak residue during loading, unloading, and transportation. A leak could damage the environment and endanger the health and safety of drivers or other personnel.



Step 3: Empty Packaging Certification

Empty packaging certification (EPC) is at the heart of a system of responsible packaging management. EPC is a written document, executed by the packaging emptier. It confirms that the packagings being transferred to a reconditioner are actually empty, in accordance with EPA standards, and that they have been properly prepared for transportation.

Certification is the emptiers principle guarantee of compliance with federal environmental laws, and serves as an important business record because it documents the fact that the emptier performed his legal duties properly.

Step 4: Employee Training

Full and empty chemical packagings are regulated by DOT and other federal agencies, requiring that appropriate employees be trained as “HazMat employees.” These training requirements ensure employees understand the nature of the materials with which they are working, the federal rules applicable to container handling, and emergency procedures if an accident should occur.

Step 5: Selecting a Qualified Reconditioner

One of the most important aspects of responsible packaging management is the selection of a qualified reconditioning company. The following is a brief list of items to check when making such a selection:

- Visit the reconditioner to ensure the firm has the necessary equipment to properly process empty chemical packaging.
- The company should have a written quality control plan.
- The firm should have employee training records available for inspection.
- The firm should be a member of the Reusable Industrial Packaging Association, and comply with the Association’s Code of Operating Practice.

Five Steps for Responsible Packaging Management

- Select a Quality Packaging
- Proper Emptying is Crucial
- Empty Packaging Certification
- Employee Training
- Selecting a Qualified Reconditioner

The **Reusable Industrial Packaging Association (RIPA)**, founded in 1942, promotes the safe, efficient, and environmentally responsible design, manufacturing, collection, reconditioning, remanufacturing, and reuse of reusable industrial packaging. www.reuseablepackaging.org



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Responsible Packaging Management

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