CONTAINER ACCEPTANCE POLICY

Purpose

The purpose of this policy is to:

- Instruct container generators on how to prepare used empty containers (drums and IBCs) for legal and safe shipment to a Mauser Packaging Solutions (MPS) reconditioning site.
- Describe our review and acceptance procedures for approving customer/generator requests to ship used empty containers to an MPS reconditioning site for responsible reconditioning or recycling.
- Provide lists of container contents for which acceptance is either prohibited or restricted.
- Describe the rejection, quarantine, and return process for containers that are not in compliance with the MPS container acceptance policy (i.e., containers that have an unacceptable level of residual contents, or containers that previously held prohibited or restricted materials).

General Container Acceptance Criteria

All used containers (drums and IBCs) sent to MPS must conform to the following standards:

- All closures (plugs, covers, closing rings, IBC caps, etc.) must be in place and secured in the same manner as if the container were shipped full of product.
  - Refer to the USEPA regulations at 40 CFR 261.7 for more information.
  - All outside surfaces of the containers must be clean and free of chemical contamination.

- Original content labels showing product name, manufacturer, and associated health hazards must be intact and legible.

- Containers must be “drip dry”, i.e., as empty as possible using normal emptying methods (pouring, pumping, or aspirating) to remove all pourable material and:
  - Drums contain no more than one inch of non-pourable material, or 3% by weight of the total capacity of the drum.
  - IBCs contain no more than one inch of non-pourable material, or 0.30% by weight of the total capacity of the IBC.
  - Refer to the USEPA regulations at 40 CFR 261.7 for more information.

- Containers shipped to and processed in California must be “drip dry”, i.e., as empty as possible so that no material can be poured or drained from the container when it is held in any orientation, e.g., tilted, inverted, etc. and:
  - In drums, no non-pourable material remains that can feasibly be removed by physical methods, including scraping and chipping (but not rinsing).
  - In IBCs, the residue is no more than 0.30% by weight of the total capacity of the IBC.
  - Refer to the California DTSC fact sheet for 22 CCR 66261.7 for more information.

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Product Review and Approval

- **General Material Classes**
  - All new and existing customers shipping drums or IBCs to a MPS reconditioning facility must provide Safety Data Sheets (SDSs) upon request.

- **Special Material Classes**
  - MPS does not accept residue types listed in Appendix A, Products Never Accepted by MPS with the following exception**.** Items marked with a (*) on this list may be accepted provided the generator triple rinses and has failsafe systems in place to ensure containers do not miss the triple rinse process. Written procedures must be provided to MPS and must be approved by the EHS Director.
  - Containers that previously held materials listed in Appendix B, “Triple Rinse Required,” must be triple rinsed and then marked or labeled with the words “Triple Rinsed.
  - Containers that previously held materials listed in Appendix B, “Triple Rinse Required… or… No Triple Rinse Facility Exemption,” may be triple rinsed or accepted by designated facilities on the exemption list without triple rinse with the pre-approval of the receiving facility Plant Manager.
  - Residues containing hydrogen bonded silicon (Si-H) compounds may not be received unless compliant to the acceptance Criteria in Appendix C, “Acceptance criteria for Si-H Materials.”

Non-Conforming Containers

Any containers that are deemed to be non-compliant with this policy cannot be processed by MPS. Non-conforming containers will be clearly labeled as such and be quarantined in a designated area. The generator/customer will immediately be notified by MPS that non-confirming containers have arrived at our property, and the generator/customer is obligated to immediately remove the non-conforming containers at their expense.

Please note that MPS reserves the right to reject an entire shipment if high volumes of non-compliant containers are found during the initial portion of unloading.

Preparing Drums & IBCs for Return

Click here to access and download a helpful poster we’ve created to assist your team in properly preparing drums and IBCs for return shipment.

Master the art of safe and compliant IBC and drum return with this instructional video. You’ll learn how to avoid common mistakes related to emptying, labeling, and stacking IBCs and drums for return to a Mauser Packaging Solutions facility for reconditioning.

Appendix A
Products Never Accepted By MPS

Exception: Items (*) on this list may be accepted provided the generator triple rinses and has failsafe systems in place to ensure drums do not miss the triple rinse process. **Written procedures must be provided to MPS and must be approved by the EHS Director.**

- Acutely hazardous residues as defined by 40 CFR 261.33(e) (RCRA P List)
- DOT Class 1 and Other Explosive Materials
- DOT Class 2 and Other Gaseous Materials
- DOT Class 4.1 and Other Flammable Solids not otherwise listed in Appendix B
- DOT Class 4.2 and Other Spontaneously Combustible Materials
- ***DOT Class 4.3 and Other Water Reactive Materials
- DOT Class 6.2 and Other Biological or Infectious Materials
- DOT Class 7 and Other Radioactive Materials
- Dioxin-Bearing Waste
- PFAS (Perfluoroalkyl Substances) – Known to contain
- Galvanized drums (not to be processed through Drum Reclamation Furnaces)
- ***Hydrofluoric Acid
- ***Hydrogen Fluoride
- ***Hydrogen-Bonded Silicones (Si-H) Greater than 300ppm (washing operations)
- ***Hydrogen-Bonded Silicones (Si-H) Greater than 2.5ppm (Drum Reclamation Furnaces)
- Malathion/Parathion
- ****Mercaptans (Thiols), Pyridine and other extremely high odor compounds
- Mercury/Lead/Cadmium/Arsenic/Hexavalent Chromium/Selenium/Silver – bearing materials.
- PCBs (Polychlorinated biphenyls)
- ***Potassium Permanganate
- *Sodium Permanganate

Appendix B
Products Accepted with Triple-Rinse & Facility Exemptions

Triple Rinse Required: (Concentration equal to or greater than 0.1%)

- Acrylonitrile
- Ammonium Bisulfite
- Ammonium Fluoride
- Ammonium Bifluoride
- Ammonia Perchlorate
- Ammonium Hydroxide
- Aqua Ammonia
- Benzene
- Butyl acrylate
- Dimethyl cyclohexylamine
- DOT Class 5.1 Oxidizers PG I
- DOT Class 6.1 PG I & II Poisonous materials
- Fluorosilicic Acid
- Formaldehyde
- Formic Acid
- Halogenated Organic Compounds
- Hydrofluorosilicic Acid
- Hydroxyethyl Methacrylate
- Hydrochloric Acid
- Lachrymators (causes the eyes to tear)
- Poisons: WHMIS (Canada)
- Potassium Bifluoride
- Potassium Fluoride
- Silicones-Reactive to water
- Sodium Bisulfide
- Sodium Bisulfite
- Sodium Perchlorate
- Triethylamine

Triple Rinse Required… or… No Triple Rinse Facility Exemption

- Acids of concentrations greater than 50%, or pH less than 2.0
- Caustics of concentrations greater than 50%, or pH greater than 12.5

DOT criterion below applies to both Primary and Secondary Hazard Classes.

- DOT Class 5.1 Oxidizers PG II & III
- DOT Class 5.2 Organic Peroxides
- FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act)- Regulated Materials

Please note: Certain MPS facilities may restrict the acceptance of additional materials due to high odor or other hazardous properties that conflict with their local operating circumstances.