



Purpose

The purpose of this policy is to:

- Outline the requirements for how used containers must be prepared by customers prior to shipment to MPS.
- Describe MPS's procedure for reviewing and approving requests for used containers to be accepted for reconditioning.
- Provide lists of former container contents for which acceptance is either prohibited or restricted.
- Describe how containers that are not properly prepared by customers may be handled.

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.
- 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 <u>and</u>:
 - <u>Drums</u> contain no more than one inch of non-pourable material, or 3% by weight of the total capacity of the drum.
 - <u>IBCs</u> 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 <u>40 CFR 261.7</u> for more information. For Canada, please refer to CGSB 43.126 Part II para. 5.4 and Part III para. 9.4.





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)

Special Material Classes

- MPS does not accept residue types listed in Appendix A, Products Never Accepted by MPS.
- Containers that previously held materials listed in Appendix B, Products Accepted with Pre-Approval and/or Triple Rinse, must be triple rinsed and then marked or labeled with the words "Triple Rinsed" unless the MPS receiving facility has provided a specific exemption.

Non-Conforming Containers

Containers that are found upon inspection to be non-conforming to this policy will not be processed. Non-conforming containers may be refused and returned at generators expense or will be quarantined in a designated area until such time that the customer arranges removal from the MPS site at their expense within 14 days.

Full Trailer Rejection

If non-conforming containers are found on the trailer, the entire load may be rejected and the containers reloaded. In this event, the load will be diverted to a destination of the customer's choice, and the customers will be responsible for all freight costs, both incoming and the return freight.

Preparing Drums & IBCs for Return

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

<u>Master the art of safe and compliant IBC and drum</u> <u>return with this instructional video.</u> 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 ("RCRA P List")
- Class 1 and Other Explosive Materials
- Class 2 and Other Gaseous Materials
- Class 4.1 and Other Flammable Solids not otherwise listed in Appendix B
- Class 4.2 and Other Spontaneously Combustible
 Materials
- Class 4.3 and Other Water Reactive Materials
- Class 6.2 and Other Biological or Infectious Materials
- Class 7 and Other Radioactive Materials
- Dioxin-Bearing Waste
- Fluorosilicic Acid

- Hexavalent Chromium Cr(VI)
- *Hydrofluoric Acid
- *Hydrogen Fluoride
- Malathion/Parathion
- **Mercaptans (Thiols), Pyridine, and other extremely high odor compounds
- Mercury/Lead/Cadmium/Arsenic/Chromium/ Selenium/Silver-bearing materials
- PFAS (Perfluoroalkyl and Polyfluoroalkyl Substances) known to exist
- PCBs
- Sodium/Potassium Permanganate

Special Note:

(**)Assessing a materials level of odor from an SDS can be difficult. In situations where the degree of odor is in question, a smaller trial run may be received for evaluation with the Plant Manager approval. Employees processing these units shall be communicated to regarding the trial and will be included in the recommendation process to receive or reject any future shipments into the facility. High odor materials are not accepted for processing through MPS facilities. These materials cause work related environment issues for our employees and nuisance odors with residents and businesses in the vicinity of the facility.





Appendix B

Products Accepted with Pre-Approval and/or Triple-Rinse

This criterion applies to both Primary and Secondary Hazard Classes.

- Acids of concentrations greater than 50%, or pH less than 2.0
- Acrylonitrile
- Ammonium Bisulfite
- Ammonium Fluoride
- Ammonium Biflouride
- Ammonia Perchlorate
- Aqua Ammonia (Ammonium Hydroxide)
- Benzene
- Butylacrylate
- Caustics of concentrations greater than 50%, or pH greater than 12.5
- Dimethyl cyclohexylamine
- DOT Class 5.1 Oxidizers
- DOT Class 5.2 Organic Peroxides
- DOT Class 6.1 PG I & II Poisonous materials
- FIFRA-Regulated Materials
- Fluorosicilic Acid (Hydrofluorosicilic Acid) no plant exceptions

- Formaldehyde
- Formic Acid
- Halogenated Organic Compounds
- Hazardous Waste Containers
- Hydroxyethyl Methacrylate
- Hydrochloric Acid
- Lachrymators (causes the eyes to tear)
- Perchloric Acid
- Poisons: Class B
- Poisons: WHMIS (Canada)
- Silicones other than Hydrogen-Bonded Silicon (SiH) Compounds
- SiH Hydrogen-Bonded Silicon Materials
- Sodium Bisulfide
- Sodium Bisulfite
- Sodium Perchlorate
- Triethylamine

Product	Facilities Exempt from Triple-Rinse Requirement	Exemption Criteria
Class 5.1		All containers must be drip-dry
Class 5.2		All containers must be drip dry
Acids >50% Caustics >50%		All containers must be drip dry
FIFRA-Regulated Materials (except when DOT Class 6.1 PG I & II) and Agricultural Products not otherwise referenced in Appendix A		All containers must be drip dry

Exemption List