# FAQs – Drums (1 of 2)

### Why is a drum with 1" of residue not empty?

"Empty" means that the drum must be as empty as possible using practices commonly employed to remove materials from drums, including pouring, pumping and aspirating. In addition, no more than 2.5 crn (1 inch) of residual material may remain in the bottom of the drum. If more material may be poured out of the drum, then it is not empty. If everything is poured out, but more than 2.5 centimeters (1 inch) remain on the bottom, the drum is not empty. If the residual material is listed by EPA in 40 CFR 261.33(E) as a "P-listed" acute hazardous waste, the drum is not deemed empty unless it has been triple-rinsed using an effective solvent, or has been cleaned by method shown to achieve equivalent removal.

### What happens if we send a drum to MCS that is not empty?

Drums containing residues of prior contents, that are to be loaded on the reconditioning firm's trucks by the reconditioning firm's employees, may be rejected if they appear to be unduly heavy because of the unintended retention of product. Drums brought to the reconditioning firm's plant, or loaded on the reconditioning firm's vehicle by the emptier's employees, may be rejected at the reconditioning firm, if, upon internal inspection, they are found to he not empty. Rejected drums shall be returned to the emptier as product and the emptier shall be advised of the reason for the rejection.

### Is every incoming drum inspected?

MCS must inspect each raw drum when it is unloaded from transportation equipment. All drums must be inspected to make certain they are empty, to determine the original specification of the drum, and to determine whether the drum is damaged or unreconditionable and therefore must be scrapped.

### What are the Principles of Responsible Container Reconditioning?

As a member of The Association of Container Reconditioners, this company is committed to support the continuing effort to improve the container reconditioning industry's responsible performance of its role in waste source reduction recycling, and responsible container management We pledge to manage our business according to the following guiding principles. We:

1. Adhere to ACR's Code of Operating Practice.
2. Recognize and respond to community concerns about container disposal and the operations of container reconditioning facilities.
3. Produce containers that are effective in safely containing all appropriate material in transportation and storage.
4. Make health, safety and environmental considerations a priority in our planning for all existing and new processes.
5. Counsel container users on the safe use, transportation, emptying, reuse and recycling of containers.
6. Operate our plants in a manner that protects the environment and the health and safety of our employees and the public.
7. Work with others to resolve problems created by past container disposal practices
8. Participate with government and others in creating responsible laws, regulations and standards to safeguard the community, workplace and environment.
9. Promote the principles and practices of Responsible Container Management by sharing our experiences and offering assistance to others who produce, use, transport or dispose of containers.
10. Foster the integrity and reputation of the industry by refraining from publishing knowingly false, misleading or commercially disparaging statements or advertisements about our products and services, or the products and services of competitors.

# FAQs – Drums (2 of 2)

### What does MCS do to protect the environment?

Wastewater and air emissions. Discharges of wastewater from the reconditioning plant to the sewer system, storm water run-off, and emissions to the atmosphere, must meet applicable water and air pollution regulations for Alabama. Offensive emissions must be minimized whether subject to government controls or not.

### What is the Association of Container Reconditioners?

The Association of Container Reconditioners is the trade group for the United States and Canadian container reconditioning industries. Member companies process over 90% of the steel drums reconditioned and recycled annually.

Founded in 1941, ACR has established ‘`Responsible Container Management” as its principal program to respond to today’s strict standards of environmental responsibility.

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### Must PLASTIC tight head drums be tested after each use and what is the regulation controlling this?

Under 49 CFR 173.28 a plastic drum that is not more than five (5) years of age may be reused without leakproofness testing if it meets all of the provisions of 173.28 (7). Normally, the most difficult provision is (iii) ‘`transported in a transport vehicle or freight container under the exclusive use of the refiller.”

### Are shipping papers required for empty drums going to a drum reconditioner?

Under CFR 173.29 (2) Is not subject to the shipping paper requirements of this subchapter when collected and transported by a contract or private carrier for reconditioning, remanufacture or reuse. MCS does require the shipper to fill out an “Empty drum certification form” agreeing to the following:

1. This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the DEPARTMENT OF TRANSPORTATION. (49 CFR 172.204}
2. It is further certified that all containers are empty: that all plugs, lids and rings are securely in place. (49 CFR 173.29)
3. It is further certified that all containers are properly classified, described and offered for shipment according to the applicable regulations of the ENVIRONMENTAL PROTECTION AGENCY (40 CFR Parts 260-263), and that they are EMPTY as defined in 40 CFR 261.7, and have not contained “acutely hazardous waste,” as listed in 40 CFR 261.33 (e). and that all “RQ” markings apply only to the original, filled containers and not to these empty containers.

### Which steel drums can be reconditioned for hazardous materials use?

When shipping hazardous material in a reconditioned steel drum it must be a minimum thickness of 1.2/.09/1.2, leakproofness tested, and reconditioned. (49 CFR 173.28)

### Are shipping papers and placarding required for empty used drums transported by a contract or private carrier for reconditioning or reuse?

No Shipping papers or placarding are required. (49 CFR 173.29 (i)(ii))