



## **B. Stephen Cooperage, Inc.**

Complete Drum Reconditioning and Removal Service  
PO Box 9537, Ontario, CA 91762  
(909) 591-2929 Fax (909) 591-1811

# **Drum Acceptance Policy**

## **1.0 INTRODUCTION**

State and federal regulations provide that containers (drums) may be exempted from the hazardous waste regulations if the containers are properly emptied. Empty is defined in the federal regulations under 40 CFR section 261.7 and in "new" California regulation found in Title 22 section 66261.7, effective 2-18-91.

California's new definition of any "empty" drum is more stringent than the federal definition, and imposes emptying requirements that go beyond those required by 40 CFR section 261.7.

## **2.0 OBJECTIVE**

Our company policy is to accept only those drums picked up from or delivered to our plant by an empty drum generator (emptier) or an intermediary, that have been emptied as defined in the California regulations. The sections that follow specify the guidelines for acceptance.

## **3.0 RESPONSIBILITY**

Under the new regulations, CAL/EPA has placed the responsibility for determining the regulatory status of the container (e.g. hazardous or non-hazardous) with the federal "generator". This is consistent with other state and federal regulations. The department justifies this approach on the grounds that it is advantageous for waste minimization and health and safety reasons to have all the material possible removed from the container prior to transportation. If the "generator" does not render the container "California empty", then the drums cannot go to a reconditioner, and consequently must be handled by the generator as a hazardous waste.

## **4.0 ACCEPTANCE CRITERIA FOR RECONDITIONING OR RECYCLING**

### **4.1 Non-Hazardous Determination**

The first consideration in being able to accept a drum is to determine if it has been emptied in accordance with the applicable state and federal regulations. Thus our company can accept from you only those drums that are certified as meeting the following conditions:

- a.) Open Top Drum-Pourable Residue



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An open top drum that previously held a pourable material is considered to be in acceptable empty conditions at that point in time when no further dripping of material will occur from the drum if the drum were to be inverted, without its lid and ring in place, and tilted to any angle.

### b.) Open Top Drum-Non Pourable Residue

An open top drum that contains a non-pourable residue is considered to be in an acceptable empty condition at that point in time when no additional residues can be readily removed by scraping, chipping, troweling, squeegeeing, etc.

### c.) Closed Top Drum-Pourable Residue

A closed top drum that previously held a pourable material is considered to be in an acceptable empty condition at that point in time when no further dripping of material will occur from the 2" opening of the drum if the drum were to be inverted, without its closures in place, and the 2" opening were positioned at the lowest point.

### d.) Closed Top Drum-Non Pourable Residue

A closed top drum that contains a non-pourable residue is considered to be in an acceptable empty condition at the point in time when the residual material cannot be extracted by any feasible means.

## 4.2 Transportation Requirements

The second consideration is being able to accept a drum, is to ensure that all drums meet the following conditions for labeling and closures:

a.) There are no DOT placarding or shipping requirements for "California" empty containers (49 CFR 173.29 (A) (3) (I) + (II).)

### 4.2.1 Labels

a.) Each drum must have all labels and/or markings still in place as if the drum were full of its original contents, and if necessary by

b.) Some other appropriate label that adequately describes the previous contents if different from its original contents

### 4.2.2 Closures



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- a.) All drums with fittings (typically 2" and 3/4") in the head or drum body, must have those plugs in place and securely tightened. (Our drivers carry some extra plugs and may replace plugs at our established price.)
- b.) All removable head drums must have the cover and ring in place, and the ring must be securely fastened.

### 4.3 Physical Condition and Appearance

4.3.1 In order for a drum to be accepted for reconditioning it must meet the following criteria: (Also see Exhibit I and II)

- a.) No distorted chimes on top or bottom of the drum.
- b.) No excessive body damage.
- c.) No bent rolling hoops (swedges).
- d.) No excessive corrosion or rust.
- e.) No puncture or tears.
- f.) No distorted tops (drumheads) or bottoms.
- g.) No thread damage to drum fittings.
- h.) No trash in drums.

4.3.2 Any drums that meets the non-hazardous criteria of 4.1 and the transportation requirements of 4.2, but does not meet the reconditionability of 4.3.1, may be accepted for scrap recycling.

## 5.0 **NON-ACCEPTABLE CONTAINERS**

### 5.1 Hazardous Containers

5.1.1 Drums meeting the following conditions are considered hazardous and will not be accepted:

- a.) Drums that are not emptied to the degree specified in 4.1 above.
- b.) Drums that previously contained a federally "P - listed", acutely hazardous material, unless they have been triple rinsed, properly emptied and so certified.



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### 5.2 Other Non-Acceptable Containers

5.2.1 Drums whose previous contents are unknown, or whose fittings and closures are not securely in place, will not be accepted.

## 6.0 CERTIFICATION

All empty drum generators will be required to sign an empty drum certification before drums can be accepted at our plant or removed from your facility. An empty drum certification is written documentation, executed by the drum emptier, confirming that the drums being transferred are actually empty in accordance with the applicable state and federal regulations. (See Appendix I and I-A) Appendix I-A is our pick-up tag with the certification statement & signature on the bottom.

## 7.0 VERIFICATION AND RETURN OF NON-COMPLYING DRUMS

7.1 When possible our drivers will inspect drums prior to loading onto our vehicles. Our intent is to Not pick up non-complying containers.

7.2 In addition, due to circumstances, conditions, such as (truck load quantities, generator performs loading) and human error, we also will inspect drums when they are off loaded at our facility. Drums found Not in compliance will be returned to the Generator at an appropriate cost.

## 8.0 LOADING

Our drivers will stack and load drums in their trailers. Our offer to pick up drums is based on suppliers placing the drums "on the tailgate." In cases where a trailer is "dropped" at the supplier's plant, all loading will be done by the supplier's personnel.

## 9.0 INSPECTION

Drums are inspected at our receiving yard. Drums vary considerably in their reuse value due to many factors. Some major ones are:

- 1.) gauge of metal of construction;
- 2.) DOT Specification status;
- 3.) nature of residues of previous contents, difficulty of removal, and steps necessary to handle safely and dispose of these residues;
- 4.) degree of damage and overall condition.



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Because of one or more of these factors, some drums are "non-reconditionable", and we must charge for their proper disposition. Due to strict environmental regulations, these drums must first be processed before the drum carcass may be sent to a steel scrap recycler. For this reason, there will be a charge for the processing of non-reconditionable drums.

### **10.0 PLANT REVIEW**

Our Company not only welcomes but encourages a plant review/inspection by drum emptiers sending us their drums. The reality of today's strict environmental regulation demands that all producers of secondary materials ensure that these products are handled and disposed of in compliance with all current laws and rules. Please contact us to schedule a plant inspection; we cannot accommodate "drop-in" visits.