

# Composite IBCs in Agchem Service

## Glossary of Terms

U.S. Hazardous Materials Regulations – Performance oriented packaging standards; based on UN model regulations (49 CFR).

Registrant – Pesticide manufacturer

Ag Retailer – Coops; farm supply outlets; pesticide distributors

FIFRA Label – EPA; federal pesticide law; registrant's instructions on product use and container management

Hazmat Mark – DOT; durable label indicating packaging's performance rating, certification

EPA Container and Containment Rule - Final rule effective August, 2011

Mini Bulk – Ag' chem industry term

Intermediate Bulk Container (IBC) – DOT hazmat term.

Composite IBC - HDPE plastic bottle-in-a-cage design; typically 275 and 330 gallons.

Refillable Container - An EPA FIFRA term; a narrower construct than the term "reusable" or "reconditioned" as found in hazmat rules; container is designed to meet specifications in the August 2011 rule; typically refilled with same or similar product for distribution to application site(s) by coops and ag' retailers; **may** be refilled by registrants only when triple rinsed.

DOT Agricultural Exemption – Exempt from hazmat packaging rules only for a farmer on local roads (49 CFR 173.5)

Packaging – DOT hazmat term, unfilled.

Package – DOT hazmat term, filled.

Recycling - General term; conversion of a used product (or parts thereof) into another type of product. Re: ACRC collections – *ACRA list of approved products*.

Reconditioning – DOT hazmat term; generally applies to drums and smaller; certified for reuse in hazmat service; marked as recertified (leakproofness tested).

Reprocessing – DOT hazmat term for reconditioning (re-certifying) IBCs; includes:

- 1) Routine Maintenance (washing) – requires visual verification of "leaktightness"
- 2) Repair (re-bottling; "cross bottling") – requires leakproofness test
- 3) Remanufacturing (conversion to new hazmat design type; also, "cross bottling: mixing "brands" --- full certification tests required)

2 ½ Year Test and Inspection – For hazmat packaging; part of the Qualification and Maintenance rules that also include the "reprocessing" definitions (see above).