

## **Code of Operating Practice: Reprocessing and Reconditioning of Fiber Drums**

As a member of the Reusable Industrial Packaging Association (RIPA), this company is committed to the continuing effort to improve the packaging reconditioning industry's responsible performance of its role in waste source reduction, recycling and responsible packaging management. We pledge to manage our business according to the following guiding principles. We:

- Adhere to RIPA's *Code of Operating Practice for Fiber Drums*.
- Recognize and respond to community concerns about packaging disposal and the operations of packaging reconditioning facilities.
- Produce packagings that are effective in safely containing all appropriate materials in transportation and storage.
- Make health, safety, and environmental considerations a priority in our planning for all existing and new processes.
- Counsel packaging users on the safe use, transportation, emptying, reuse, and recycling of packagings.
- Operate our plants in a manner that protects the environment and the health and safety of our employees and the public.
- Work with others to resolve problems created by past packaging disposal practices.
- Participate with government and others in creating responsible laws, regulations, and standards to safeguard the community, workplace, and environment.
- Promote the principles and practices of Responsible Packaging Management by sharing our experiences and offering assistance to others who produce, use, transport, or dispose of packagings.
- 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.

## 1.0 **Basic recommendation.**

Packaging that is mechanically processed in any way to be able to meet the design-type tests, may not be reused without first being reconditioned. Performance of any step of the reconditioning process should be accompanied by performance of all reconditioning steps. That is, if any element of reconditioning is done (e.g., cleaning, changing non-integral gaskets) then the entire reconditioning process should be completed in accordance with this Code. This is to assure that any reference to reconditioning provides the user of a drum with total packaging integrity.

## 2.0 **Reconditioning firm.**

2.1 A business that properly reconditions fiber drums is one that possesses the necessary equipment and processes drums in accordance with all of the provisions described in this *Code of Operating Practice*. Where required, a drum reconditioning firm shall be registered or licensed by appropriate government authorities and shall mark reconditioned packagings with the firm's identification as its certification of regulatory compliance.

2.2 The reconditioning firm must maintain a documented quality control program.

2.3 The reconditioning firm shall encourage plant reviews during normal operating hours by any emptier or customer.

2.4 In addition to meeting the details of this *Code of Operating Practice*, the reconditioning firm should be in compliance with all applicable government regulations pertaining to safety and health, and environmental protection.

### 3.0 Preparation and Acceptance of Emptied Drums

3.1 *Transportation of drums containing residues.* Drums that have been used for the transportation of hazardous materials that have not been completely cleaned and purged of all hazards must be transported with all closures in place, with all original hazard markings and labels legible.

3.2 *Acceptance of drums containing residues; "empty" drums.* No drums may be accepted that are not empty, unless the reconditioning firm holds permits issued by appropriate environmental authorities to receive and process hazardous wastes. "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 cm (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 a method shown to achieve equivalent removal.

California reconditioners may not accept drums that do not comply with the state empty packaging rule 22 CCR 66261.7.

3.3 *Empty drum certification.* Every person providing to a reconditioning firm drums containing any residues, regardless of prior contents, shall sign an "*Empty Drum Certification*" on each occasion that drums are offered, verifying that the drums are empty in accordance with the explanation of that term in 3.2, above.

3.4 *Rejection of drums that are 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 be not empty. Rejected drums shall be returned to the emptier as product and the emptier shall be advised of the reason for the rejection.

**3.5 Inspection of incoming drums.** The reconditioning firm 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 prepared for scrap, incineration or recycling

#### **4.0 Fiber Drum Reconditioning**

- Inspect incoming drums, their covers, gaskets (if present), and rings.
- Pull any bags or liners that may be present.
- Clean the interior and removable parts: may include washing, wiping, blowing with pressurized air, etc.
- De-identify the drum as to its previous lading. Labels may be painted over or spray painted to de-identify. For labels that are removed, caution is to be taken in avoiding removal of fiber plies.
- Re-assemble the drum and removable parts.
- Inspect the assembled and closed drum.
- If intended for hazmat service, apply durable UN mark.

4.1 Completed drums intended for hazmats must be marked with the reconditioning firm's identification number or registered symbol, and the year of testing. Drums marked in accordance with the US standards must include the nation in which the reconditioning was performed, the letter "R", and the letter "L" for drums that have been successfully leakproofness tested. If the original manufacturer's durable full UN marking has been removed in the reconditioning process, it must be replaced by the reconditioner before the drum may be used again to transport hazardous materials. The reconditioner's replacement mark may show a performance level below that originally marked by the drum manufacturer, but in no case may a reconditioner mark a higher performance level unless "remanufactured" as in 4.x below. The reconditioning firm's identity and "R" marking is a certification that the drum meets all applicable regulations and this Code of Operating Practice.

4.2 ***Remanufactured drums.*** Drums converted from DOT specification drums into UN drums, from one UN type to another type, or which have had integral structural components replaced, are remanufactured drums. All requirements applicable to the manufacturer of new drums apply to these drums, including full design type testing.

4.3 ***Rejected drums.*** Drums that have been rejected during the inspection processes and cannot be repaired for hazardous materials service are to be cleaned and directed to nonhazardous material service or prepared for scrap or incineration. When preparing drums for scrap or incineration, the drum interior and exterior must be cleaned, removing all foreign matter, prior residues, labels and closures, and then disposed of properly.

## **5.0 Environmental and employee protection.**

5.1 ***Storage of drums containing residues.*** Unreconditioned drums must be stored with all closures in place, and must be inspected periodically to assure no residual contents are leaking. All drums that are obviously unfit for reconditioning should be rejected immediately and should be prepared for scrap in accordance with the preceding

paragraphs. Damage of drum inventory from atmospheric and ground moisture must be avoided.

**5.2 *Accumulated residues from drums.*** All wastes generated in the reconditioning process must be managed in full compliance with applicable regulations governing such wastes.

**5.3 *Wastewater and air emissions.*** Discharges of wastewater from the reconditioning plant to the environment or to the sewer system, and emissions to the atmosphere, must meet applicable water and air pollution regulations for that geographical area. Offensive emissions must be minimized whether subject to government controls or not.

**5.4 *Employee protection.*** Exposure of employees to any chemicals in the workplace, including the contents of incoming drums, must be reduced to the extent practicable. At a minimum, this necessitates the reconditioning firm providing and requiring where necessary the use of effective personal protective equipment. The firm must have in place a program of *Hazard Communication* for employees, including federally mandated access to *Material Safety Data Sheets (MSDSs)* in the event an employee is stricken by exposure to a chemical or other material.

**5.5 *Training.*** Employees must be trained in the proper performance of their jobs, including awareness of the hazards of the process chemicals to which they are exposed and of the importance of compliance with this Code and all government regulations.

**5.6 *Company vehicles and drivers.*** The reconditioning firm shall employ drivers to operate company vehicles in compliance with standards of the Federal Motor Carrier Safety Administration (or other applicable, national regulatory body). The firm shall adhere to rules on the qualification of drivers, including provisions relating to alcohol or other substance abuse. Company vehicles shall be maintained in safe operating condition.

5.7 ***Fire Safety.*** All practical precautions against fires must be implemented, including having adequate fire extinguishing capability, contingency planning, effective coordination with local emergency response authorities, and good housekeeping to minimize opportunities for ignition and to facilitate employee evacuation in emergencies.

## 6.0 **Public statements and advertising**

6.1 Each RIPA member shall foster the integrity and reputation of the packaging industry, generally, and the RIPA membership specifically by refraining from publishing knowingly false, misleading or commercially disparaging statements or advertisements.

6.2 Member's public statements and advertisements shall not knowingly misrepresent fact or law, or create a negative impression or expectation about competitive products and services unless such statement or advertisement is based upon facts which are amenable to independent measurement and verification.