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Reusable Industrial Packaging Association

Guidance Document

Removal of Coatings from Steel Drums During Reconditioning

Members of the Reusable Industrial Packaging Association :

Recognize that 49 CFR Section 173.28(c)(1)(i) describes the steel drum reconditioning process as including *“Cleaning to base material of construction, with all former contents, internal and external corrosion, and any external coatings and labels removed.”*

Appreciate that leaving excessive quantities of coating material (e.g. paint) on a steel drum after completion of the reconditioning process can raise safety concerns if such materials are sufficient to hide a potential leak or unsafe condition, such as corrosion.

Recognize that the regulation anticipates the fact that traditional cleaning processes used by the industry (e.g., shot blasting, brushing) leave some amount of coating residue on the surface of the drum, and that this residue is safe because it is insufficient to prevent evidence of a leak during the leakproofness testing processes authorized in the regulations.

Understand that while the regulation does direct removal of “any external coatings and labels,” this is an impossible standard to meet and the extent to which such removal must take place to satisfy DOT is necessarily subject to interpretation since, at no time in the more than 60-year history of traditional steel drum reconditioning has any cleaning process removed literally 100% of the prior exterior coating.

Note that the degree of coating removal is predicated on the type of process used, the adhesive qualities of the original coating, the intended market for the finished drum, and customer demands.

Appreciate that at no time in the history of steel drum reconditioning have these traditional exterior cleaning processes been viewed by reconditioners or the U.S. DOT as a safety issue.

RIPA members understand that exterior coatings of steel drums should be substantially removed during the reconditioning process to meet the legitimate safety concerns of the Office of Hazardous Materials Safety.

To this end, RIPA has developed a visual guide for its members that shows with the aid of photographs appropriate and reasonable amounts of coating material remaining on reconditioned drums. The photographs help differentiate outer surface cleaning following both shot blasting and brushing operations.

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