

IMACC Corporation

Empty Packagings Identification Removal Procedure

1.0 Purpose

To establish a procedure to remove, obliterate or securely cover any hazardous material shipping name and identification number markings, any hazard warning labels or placards, and any other markings indicating that the material is hazardous. This procedure also applies to product manufacturer labels, end user labeling, return program labels and all labeling attendant to non-hazardous loadings.

The intent of the procedure to establish a policy and a procedure to guarantee that empty packagings / containers sent to any IMACC Corporation facility will not leave those sites with labeling or markings which identify the manufacturer or the user of the product previously contained in the container, and to assure that the hazard is removed (**sufficiently cleaned of residue and purged of vapors to remove any potential hazard**). This process is known as de-identification.

2.0 Scope

This procedure applies to the emptier of the container and all IMACC Corp locations. The procedure allows the emptier to conditionally remove labels prior to shipment to a IMACC location, and / or provides that all empty packagings / containers processed at IMACC locations will have all manufacturer or emptier information removed during reconditioning or if prepared for disposal or recycling (primarily plastic and steel). Finished containers are de-identified by the reconditioning process, with the exception of permanent or still valid durable UN markings.

3.0 Procedure

3.1 Emptier Labeling Removal

DOT Hazardous Material Loadings – IMACC Corp locations will accept de-identified packagings from emptier or a collection service based on application of the provisions of the current version of 49 CFR 173.29 (see Appendix B). As a policy, a replacement label must be applied indicating that the container meets the conditions of 49 CFR 173.29 to have the labels removed and a general description of “Contents Previously Contained _____” or an equivalent system provided by the emptier. IMACC Corporation must provide a one time written approval to remove labels from specific emptier locations.

| Document # | Issue Date | Revision # | Authority | Page |
|---------------|------------|------------|-------------|--------|
| 5.2 EP-173.29 | 6/24/2003 | “A” | Dana Zanone | 1 of 4 |

IMACC Corporation

Empty Packagings Identification Removal Procedure

Not Regulated by DOT - As a policy (as is required for hazardous loadings) for non-hazardous loadings the residues must be sufficiently cleaned of residue and purged of vapors to remove any potential hazard. Additionally, no more than a cup of residual residue may remain in the well area, a replacement label must be applied indicating that the container is sufficiently cleaned of residue and purged of vapors to remove any potential hazard and a general description of “Contents Previously Contained _____” or an equivalent system provided by the emptier. IMACC Corporation must provide a one time written approval to remove labels from specific emptier locations.

3.2 IMACC Labeling Removal

This procedure establishes a policy and a procedure to guarantee that empty packagings / containers sent to any IMACC facility will not leave those sites with labeling or markings which identifying the manufacturer or the user of the product previously contained in the container, and to assure that the hazard is removed (**sufficiently cleaned of residue and purged of vapors to remove any potential hazard**). This process is known as “de-identification”.

Acceptance from Emptiers – Provisions of the RoundTrip Acceptance policy are effective at all IMACC locations. Provisions include the requirements of 49 CFR 173.29 (packagings must be intact and have all closure devices - fittings, covers, rings, caps and valves in place and closed for shipments). As well as the IMACC Corporation Acceptance policy posted at www.imacc-corp.com, and the provisions of this procedure.

Label Removal during Reconditioning, Remanufacture, Repair and Routine Maintenance – Inherently, during these processes, non-permanent manufacturer, emptier and return system labels are removed. In some cases, it is important to retain, restore and / or update (i.e., testing and inspection dates) permanent and / or durable UN markings. Special care is required at our facilities to understand the UN mark and our relationship to the UN mark. All other labels shall be removed during these processes.

Label and Product Removal during Recycling or Packaging Destruction Operations – All labeling will be removed during these processes prior

| Document # | Issue Date | Revision # | Authority | Page |
|---------------|------------|------------|-------------|--------|
| 5.2 EP-173.29 | 6/24/2003 | “A” | Dana Zanone | 2 of 4 |

IMACC Corporation

Empty Packagings Identification Removal Procedure

to shipping to any landfill disposal, recycling or scrap recovery businesses. All Packagings will be cleaned (including those with non-hazardous ladings), and will meet the following conditions:

- ❑ **Steel Containers, IBC Cages and Metal Parts** - will be crushed and / or disassembled with labels and product residues removed prior to shipment to a steel recycler.
- ❑ **IBC Cages with plastic Inner Receptacles, Plastic Inner Receptacles (Bottles) and Poly Containers** - will have labels removed, be cleaned, crushed and / or shredded if destined for landfill disposal.
- ❑ **Plastic Inner Receptacles (Bottles) and Poly Containers** - will be cleaned, shredded and ground destined, or be cleaned and labels removed for plastic recycling. Labels will only be removed from shredded material if required by the plastic recycler.
- ❑ **Fiberboard Containers** – All inner liners will be removed and be properly disposed, and any product cleaned from the exterior and interior of packaging prior to disposal at the landfill.

3.3 Outside Processors

Any container sent to an outside contractor for reconditioning, remanufacture, repair, routine maintenance or recycling must agree to the provisions of this work instruction, must off-load the trailer directly into their process (may not inventory the empty containers) and will provide IMACC Corporation a certificate that the containers have been processed with the labels removed. The container will be de-identified by IMACC Corporation, according to this procedure if the outside processor is not able to comply with these conditions. This requirement will be applied as a quality clause, which the outside processor must agree to. It is the responsibility of the Plant Manager making these arrangements to match the certification with the shipping documents and maintain record keeping for traceability purposes. Emptiers may specify that their containers may not be sent to outside processors.

4.0 Discrepancies

All questions shall be directed to the Environmental Department for disposition.

| Document # | Issue Date | Revision # | Authority | Page |
|---------------|------------|------------|-------------|--------|
| 5.2 EP-173.29 | 6/24/2003 | "A" | Dana Zanone | 3 of 4 |

IMACC Corporation

Empty Packagings Identification Removal Procedure

Appendix

Sec. 173.29 Empty packagings

(a) General. Except as otherwise provided in this section, an empty packaging containing only the residue of a hazardous material shall be offered for transportation and transported in the same manner as when it previously contained a greater quantity of that hazardous material.

(b) Notwithstanding the requirements of paragraph (a) of this section, an empty packaging is not subject to any other requirements of this subchapter if it conforms to the following provisions:

(1) Any hazardous material shipping name and identification number markings, any hazard warning labels or placards, and any other markings indicating that the material is hazardous (e.g., RQ, INHALATION HAZARD) are removed, obliterated, or securely covered in transportation. This provision does not apply to transportation in a transport vehicle or a freight container if the packaging is not visible in transportation and the packaging is loaded by the shipper and unloaded by the shipper or consignee;

(2) The packaging--

(i) Is unused;

(ii) Is sufficiently cleaned of residue and purged of vapors to remove any potential hazard;

(iii) Is refilled with a material which is not hazardous to such an extent that any residue remaining in the packaging no longer poses a hazard; or

(iv) Contains only the residue of--

(A) An ORM-D material; or

(B) A Division 2.2 non-flammable gas, other than ammonia, anhydrous, and with no subsidiary hazard, at an absolute pressure less than 280 kPa (40.6 psia); at 20 deg.C (68 deg.F); and

(3) Any material contained in the packaging does not meet the definitions in Sec. 171.8 of this subchapter for a hazardous substance, a hazardous waste, or a marine pollutant.

| Document # | Issue Date | Revision # | Authority | Page |
|---------------|------------|------------|-------------|--------|
| 5.2 EP-173.29 | 6/24/2003 | "A" | Dana Zanone | 4 of 4 |