



ACRC
Ag Container Recycling Council

MACA Mini-Bulk Summit...Part 2

ACRC Minibulk Recycling Update

Ron Perkins
Executive Director
Ag Container Recycling Council



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Presentation Objective

- **Describe the role that the ACRC will play in the recycling of minibulks that will not comply with new regulations for refillable containers included in the Container & Containment Rule**



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Issue Review

- **October 2009: ACRC Task Force Established**
- **November 2009: Input from MACA Mini-bulk Summit**
- **January-June 2010: Planning for statewide pilot program**
- **July-December 2010: Pilot conducted in Iowa**



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The Target



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2010 Pilot Program Participants

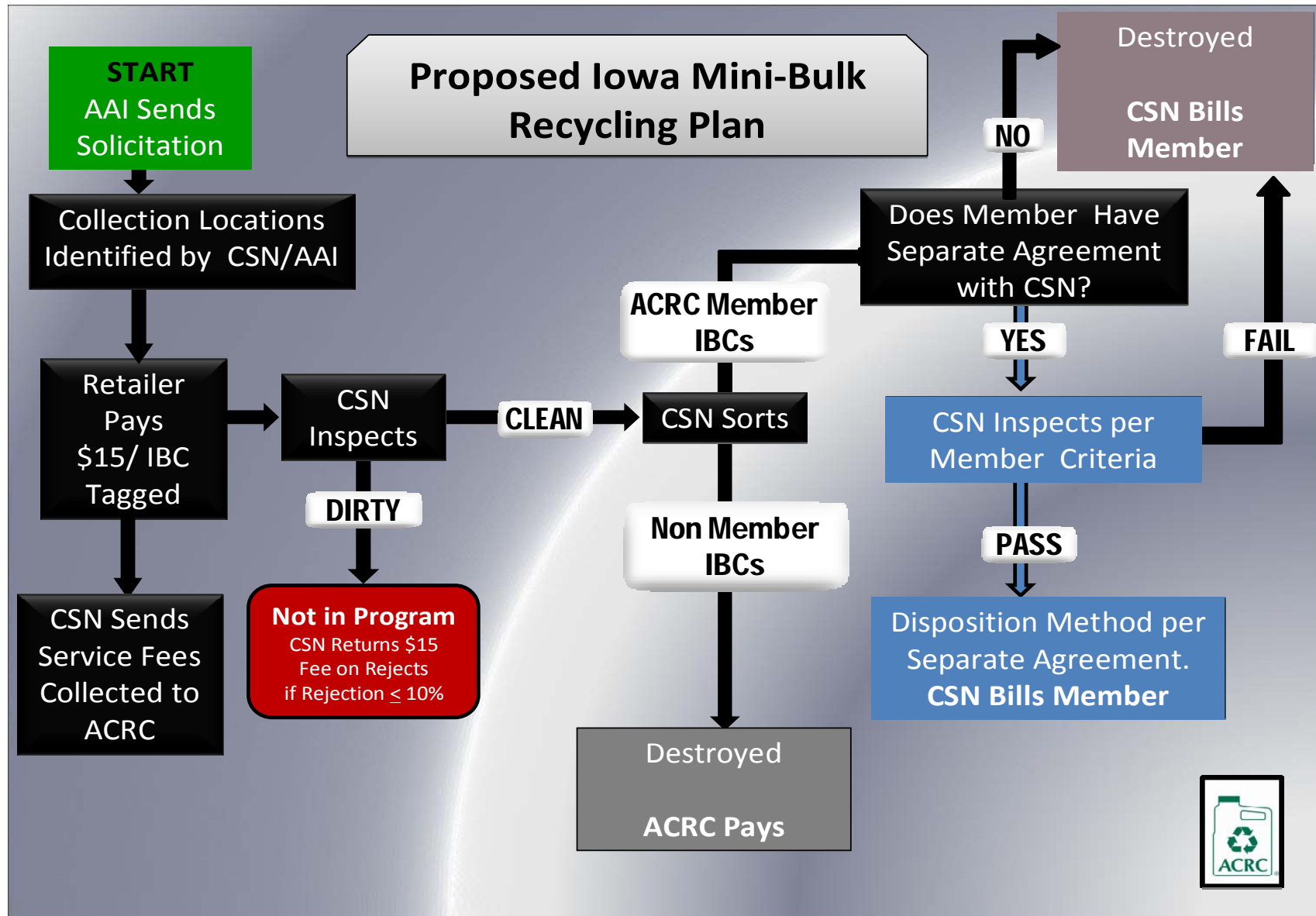
- **ACRC**
- **Agri-business Association of Iowa (AAI) staff and membership**
- **Ken Root- Root Communications**
- **CSN, LLC**
- **ACRC member companies**



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Pilot Program Process Flow





Mark the container as required by the recycling program.

Remove DOT Hazmat labels.
Keep Pesticide Panel label on container.

Minimizing Residues & Managing Rinsate

The last time the container to be recycled is used the refiller should authorize the applicator to



remove tamper evident devices, completely rinse the container into the application equipment and

apply all pesticides according to label directions.

Review state and local environmental rules and use these (together with the label and MSDS) to identify any product that may be regulated under hazardous waste rules. Some residues may be moved to containers that are dedicated to pesticide rinsate management.

The container is not clean if strong odors or visible residues are present.



Look inside container.
Remove liquid residue!

If a Container cannot be cleaned

If the container has visible residue not removable via normal cleaning then *it is outside the scope of an ACRC recycling program. Contact the registrant for disposal guidance.*

CropLife America
1156 15th St. NW, Suite 400
Washington, DC 20005

Safely Cleaning Refillable Pesticide Containers for Recycling



This guidance is intended for refillers, growers and others who have decided to recycle their refillable pesticide containers. Cleaning the container before recycling (or disposal) is the responsibility of the person disposing of the container. (40 CFR§156.156)



Sponsored by Ag Container Recycling Council (ACRC) & CLA

For more info contact:

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Washington, DC 20005
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Participating Site



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Inspection



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Inspection Certification



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Mini-bulk Plastic Recycling



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What We Learned

- **Include both the state agribusiness association and regulatory agency**
- **Target local ag retailer managers; not owners**
- **Many are not fully aware of new regulations**
- **Getting tanks ready for recycling is not a priority for owners; sales and customer service come first!**
- **Timing is everything!**
- **Allow at least two months for targeted participants to sign up and find time to make preparation a priority; set & keep deadlines**



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What We Learned (cont'd)

- There are legitimate recycling alternatives
 - Registrants
 - Composite IBC manufacturers
 - Container recycling service vendors
- There are illegitimate alternatives
 - Reusing tanks for other products; e.g. used oil
 - Selling/giving tanks away for reconditioning
 - Selling tanks to local scrap dealers; mixed with other plastics
 - Landfilling



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- Be clear that only clean containers will be accepted
- \$15 fee is not a deterrent
- Inspecting containers at the source is beneficial
- There is adequate infrastructure in the “free market” to meet mini-bulk recycling needs





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Our Conclusions

- **There are sufficient mechanisms to address the needs of industry in the proper management of unwanted mini-bulks**
- **The role of ACRC should be to work with CropLife America and USEPA in the development and dissemination of educational materials relating to the new refillable container regulations**



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ACRC FUTURE ROLE IN MINI-BULK RECYCLING

- ACRC will not provide funding to any collection or recycling program for mini-bulks in the foreseeable future.
- ACRC will remain focused on original mission of collecting and recycling pesticide containers 55 gallons or smaller
- ACRC will share practices needed for good product stewardship.



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Member Contact List

ACRC Member Company Contacts for Planning and Conducting Mini-bulk Recycling Programs

Company	Contact Person	Telephone	E-mail Address
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ACRC DVD VIDEO

ACRC / AAI Mini-Bulk Recycling Program Review



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Thank You

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