



## Customer Drum Return/Pick-Up Guidelines

Eastern Oil Company encourages the reuse and recycling of properly prepared 55-gallon steel drums. Since many drums may contain, or may have contained, hazardous materials that could contaminate groundwater or lead to personnel health and safety concerns, it is imperative that operators be informed about the best management practices for collecting and processing drum returns.

Drums collected by Eastern Oil Company intended for recycling are required to adhere to the following guidelines:

- Drums must be empty, with no residual materials inside, on the top or outside
  - Per Michigan's Department of Environmental Quality (MDEQ) waste management guidelines and the EPA's Resource Conservation and Recovery Act (RCRA), empty is defined as:
    - Containers holding non-acute hazardous waste and liquid industrial waste are considered empty when the container or inner lining that held the waste has had as much material removed as possible (by practices commonly used to remove that material such as pouring, pumping, and aspirating), AND the amount of waste residue remaining in the container is any of the following:
      - One inch or less; OR
      - No more than three percent by weight of the total capacity for containers 110 gallons or less in size: OR
      - No more than 0.3 percent by weight of the total capacity for containers over 110 gallons.
- Drums must be structurally sound; No punctures, no large dents (less than ½ inch in depth, no greater than 12 inches in length), and no visible rust.
- Drums must be staged for pick-up and located in areas clearly visible to prevent damage and/or accidents. The drums should be inspected for structural integrity to ensure there is no rust, cracks, or leaks.
- Open head drums must be covered with lids sealed by heavy-duty bolt clamps, snap rings or bungs.
- All drums scheduled for pick-up must have a GHS compliant label that identifies what the drum contained. The Department of Transportation does not allow the transport of any unlabeled or unidentified drums.
  - Eastern Oil Company will recycle non-Eastern drums but the drums must have originally contained lube oils only, must be properly labeled/identifiable and comply with all EOC drum return guideline requirements.
- Drums scheduled for pick-up should have the label(s) facing outwards so that the label(s) can be easily read.
- Drum pick-ups are limited to 6 empty drums per day/location.
- The empty drums should not be stacked or covered with other materials.

In summary, all drums should be managed to prevent hazard and contamination. Please keep your drums sealed, easily accessible, labeled, and frequently inspect them for structural integrity. Thank you for your continued support and cooperation.



## Acceptance Criteria - What is “empty?”

- By law, Eastern Oil Company can only accept containers that are empty as defined by the Resource Conservation & Recovery Act (RCRA).
- The acceptable amount of residue for an empty container is clearly defined by the EPA in the Code of Federal Regulations(40 CFR 261.7).
- 40 CFR 26.17 states that containers must be “drip-dry,” but does allow for minor residuals of highly viscous products.

### 40 CFR §261.7: The Law

§261.7 Residues of hazardous waste in empty containers.

(a)(1) Any hazardous waste remaining in either: an empty container; or an inner liner removed from an empty container, as defined in paragraph (b) of this section, is not subject to regulation under parts 261 through 268, 270, or 124 this chapter or to the notification requirements of section 3010 of RCRA. (2) Any hazardous waste in either a container that is not empty or an inner liner removed from a container that is not empty, as defined in paragraph (b) of this section, is subject to regulation under parts 261 through 268, 270 and 124 of this chapter and to the notification requirements of section 3010 of RCRA.

(b)(1) A container or an inner liner removed from a container that has held any hazardous waste, except a waste that is a compressed gas or that is identified as an acute hazardous waste listed in §§261.31 or 261.33(e) of this chapter is empty if:

- (i) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating, and
- (ii) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container or inner liner, or (iii)(A) No more than 3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is less than or equal to 119 gallons in size; or

(B) No more than 0.3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is greater than 119 gallons in size.

(2) A container that has held a hazardous waste that is a compressed gas is empty when the pressure in the container approaches atmospheric.

(3) A container or an inner liner removed from a container that has held an acute hazardous waste listed in §§261.31 or 261.33(e) is empty if:

- (i) The container or inner liner has been triple rinsed using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate;
- (ii) The container or inner liner has been cleaned by another method that has been shown in the scientific literature, or by tests conducted by the generator, to achieve equivalent removal; or
- (iii) In the case of a container, the inner liner that prevented contact of the commercial chemical product or manufacturing chemical intermediate with the container, has been removed.

## Acceptance Criteria - What is “empty?”

“Empty” is NOT in the eye of the beholder and is clearly defined by the Federal Government, not Eastern Oil Company. The following information will help make sense of how “empty” can differ depending on the circumstances.

### Drums & Pourable Liquids

**When thinking of “empty” for a drum with a “pourable” liquid inside:**

Imagine a Diet Coke can that you have tried to get the last bit of soda out of. You turn it upside down but nothing comes out. Yet, when you shake the can you can still hear liquid moving around inside, and more soda will come out – just not in a continuous stream. This is essentially what is meant by the term “drip-dry.”

A closed-top drum, or an open-top drum with the cover and ring in place, will act in much the same way as a soda can in this regard. While you are not obliged to shake the drum’s contents out for it to be considered empty, liquid cannot come out in a continuous stream under any circumstances.

Whether the drum has a closed-top or an open-top, no pourable liquid = “Drip Dry!”



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### Drums & Viscous Materials

**When thinking of “empty” for a drum with a highly “viscous” liquid inside:**

Imagine a peanut butter jar that you have tried to get everything out of. You have scraped it as best you can, yet some residue is always left inside the jar. A drum that contained a viscous material (like peanut butter...) is considered empty only after everything that can be poured, pumped or scraped out using normal processes has been removed. Up to 2.5CM (1”) can remain inside the drum as long as it doesn’t exceed 3% by weight of the total capacity of the container. This is commonly referred to as the “one inch rule.” However, this rule applies only once you have exercised every reasonable method to remove all residue from the drum.

No pourable liquid allowed...“Drip Dry” is a must. The afore-mentioned “one inch rule” rule does NOT apply to pourable liquid.





## Preparing Drums for Proper Pick-Up

All drums scheduled for Eastern Oil Company pick-up must adhere to the “Drum Return/Pick-Up” guidelines. Scan the QR code to view the detailed guidelines.

Here are some examples of drums that are ready for pick-up:

- Labels must be affixed to drum
- Labels must be legible



- Plugs must be installed
- Lids & rings must be installed on open-head drums



- Drum is structurally sound
- No visible rust/large dents
- Drum meets the definition of “empty”



## Drums EOC Not Allowed to Transport per State & Federal Regulations

All drums scheduled for Eastern Oil Company to pick-up must adhere to the “Drum Return/Pick-Up” guidelines.

Here are some examples of drums that we are not allowed to pick-up/transport:

- Dent exceeds 1/2” depth & 12” in length
- Label damaged/not legible



- Too much pourable liquid



- More than 1” of viscous residue

