



P.O. Box 15150  
5200 (Rear) Manchester Ave.  
St. Louis, Missouri 63110  
314-647-3464  
314-647-9203 fax

Customer: \_\_\_\_\_ Date: \_\_\_\_\_

Carrier: \_\_\_\_\_ Trailer #: \_\_\_\_\_ Drums or Totes  
(Circle One)

Customer/Shipper's Count: \_\_\_\_\_ Verified Count: \_\_\_\_\_  
(Subject to Count) (For Drumtech use Only)

**EMPTY CONTAINER CERTIFICATION  
FOR DRUMS and INTERMEDIATE BULK CONTAINERS (IBC's/Totes)**

I hereby certify that these containers are "completely empty" as that term is defined in the National Environmental Protection Agency Regulations 40 CFR 261.7\*, and that they have been properly prepared for transportation under the regulations of the U.S Department of Transportation, 49 CFR 173.29\*\*.

Customer/Shipper Signature: \_\_\_\_\_

**ALL Containers must be shipped loose (not palletized) and stacked right-side-up with lids, rings and plugs securely fastened. Non-empty containers or containers not properly prepared for transportation may be refused and returned at the customer's expense.**

For the protection of Drumtech, Inc. and its customers, all wastes generated by the recycling and disposal process are incinerated by EPA compliant disposal facilities. This practice requires that all drums and IBC's be completely empty. A container is "completely empty" when all free-flowing residues that cling to the interior surface of the container have been poured or scraped out, exposing 90% of the container's original surface.

\*EPA's 40 CFR 261.7 states that, with regard to most regulated residues\*\*\*, a container is empty if:

- a. 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, aspirating...and...
- b. No more than 2.5 centimeters (one inch) of residue remains in the bottom of the container\*\*\*\*.
- c. 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 110 gallons in size (IBC's).

\*\*DOT 49 CFR 173.29 says that all openings on the empty container must be closed and that all markings and labels must be in place as if the container were full of its original contents. DOT shipping papers are not required for transportation of drums bound for reconditioning via contract or private motor carrier. Common carriers may require DOT shipping papers and MSDS's along with shipments.

\*\*\*For residues of products specifically listed by name in 40 CFR 261.33 (e), EPA says the container is empty only "if the container has been triple rinsed using a solvent capable of removing the product, or has been cleaned by another method shown to achieve equivalent removal."

\*\*\*\*EPA has explained this rule, saying that "one inch of waste material is an overriding constraint and may remain in an empty container only if it cannot be removed by normal means."

Contact Drumtech, Inc. if you have questions about this certification.