CONTAINER ACCEPTANCE POLICY

Purpose

The purpose of this policy is to:

- Instruct container generators on how to prepare used empty containers (drums and IBCs) for legal and safe shipment to a Mauser Packaging Solutions (MPS) reconditioning site.
- Describe our review and acceptance procedures for approving customer/generator requests to ship used empty containers to an MPS reconditioning site for responsible reconditioning or recycling.
- Provide lists of container contents for which acceptance is either prohibited or restricted.
- Describe the rejection, quarantine, and return process for containers that are not in compliance with the MPS container acceptance policy (i.e., containers that have an unacceptable level of residual contents, or containers that previously held prohibited or restricted materials).

General Container Acceptance Criteria

All used containers (drums and IBCs) sent to MPS must conform to the following standards:

- All closures (plugs, covers, closing rings, IBC caps, etc.) must be in place and secured in the same manner as if the container were shipped full of product.
  - Refer to the USEPA regulations at 40 CFR 261.7 for more information.

- Original content labels showing product name, manufacturer, and associated health hazards must be intact and legible.

- Containers must be “drip dry”, i.e., as empty as possible using normal emptying methods (pouring, pumping, or aspirating) to remove all pourable material and:
  - Drums contain no more than one inch of non-pourable material, or 3% by weight of the total capacity of the drum.
  - IBCs contain no more than one inch of non-pourable material, or 0.30% by weight of the total capacity of the IBC.
  - Refer to the USEPA regulations at 40 CFR 261.7 for more information.

- Containers shipped to and processed in California must be “drip dry”, i.e., as empty as possible so that no material can be poured or drained from the container when it is held in any orientation, e.g., tilted, inverted, etc. and:
  - In drums, no non-pourable material remains that can feasibly be removed by physical methods, including scraping and chipping (but not rinsing).
  - In IBCs, the residue is no more than 0.30% by weight of the total capacity of the IBC.
  - Refer to the California DTSC fact sheet for 22 CCR 66261.7 for more information.

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Product Review and Approval

- **General Material Classes**
  - Both new and existing container generators/customers shipping drums or IBCs to an MPS reconditioning facility may be asked to provide Safety Data Sheets (SDS) for the residual contents in the containers they wish to send to MPS.
- **Special Material Classes**
  - MPS does not accept residue types listed in ***Appendix A, Products Never Accepted by MPS.***
  - Containers that previously held materials listed in ***Appendix B, Products Accepted with Pre-Approval and/or Triple Rinse***, must be triple-rinsed and then marked or labeled with the words "Triple-Rinsed" unless the MPS receiving facility has provided a specific exemption.
  - Residues containing hydrogen bonded silicon (SiH) compounds may not be received without specific approval criteria by the MPS environment, health and safety (EHS) team.

Non-Conforming Containers

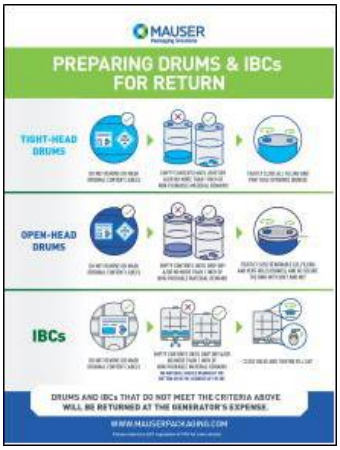
Any containers that are deemed to be non-compliant with this policy cannot be processed by MPS. Non-conforming containers will be clearly labeled as such and be quarantined in a designated area. The generator/customer will immediately be notified by MPS that non-confirming containers have arrived at our property, and the generator/customer is obligated to immediately remove the non-conforming containers at their expense.

Please note that MPS reserves the right to reject an entire shipment if high volumes of non-compliant containers are found during the initial portion of unloading.

Preparing Drums & IBCs for Return

Click here to access and download a helpful poster we've created to assist your team in properly preparing drums and IBCs for return shipment.

Master the art of safe and compliant IBC and drum return with this instructional video. You'll learn how to avoid common mistakes related to emptying, labeling, and stacking IBCs and drums for return to a Mauser Packaging Solutions facility for reconditioning.



Appendix A
Products Never Accepted by MPS

- Acutely hazardous residues as defined by 40 CFR 261.33 (“RCRA P List”)
- Class 1 and Other Explosive Materials
- Class 2 and Other Gaseous Materials
- Class 4.1 and Other Flammable Solids not otherwise listed in Appendix B
- Class 4.2 and Other Spontaneously Combustible Materials
- Class 4.3 and Other Water Reactive Materials
- Class 6.2 and Other Biological or Infectious Materials
- Class 7 and Other Radioactive Materials
- Dioxin-Bearing Waste
- Fluorosilicic Acid
- Hexavalent Chromium Cr(VI)
- Hydrofluoric Acid (Hydrogen Fluoride)
- Malathion/Parathion
- Mercaptans (Thiols), Pyridine, and other extremely high odor compounds
- Mercury/Lead/Cadmium/Arsenic/Chromium/ Selenium/Silver-bearing materials
- PFAS (Perfluoroalkyl and Polyfluoroalkyl Substances) – known to exist
- PCBs
- Sodium/Potassium Permanganate
- SiH – Hydrogen-Bonded Silicon Materials

Appendix B
Products Accepted with Pre-Approval and/or Triple-Rinse

This criterion applies to both Primary and Secondary Hazard Classes.

- Acids of concentrations greater than 50%, or pH less than 2.0
- Acrylonitrile
- Ammonium Bisulfite
- Ammonium Fluoride
- Ammonium Biflouride
- Ammonia Perchlorate
- Aqua Ammonia (Ammonium Hydroxide)
- Benzene
- Butylacrylate
- Caustics of concentrations greater than 50%, or pH greater than 12.5
- Dimethyl cyclohexylamine
- DOT Class 5.1 Oxidizers
- DOT Class 5.2 Organic Peroxides
- DOT Class 6.1 PG I & II Poisonous materials
- FIFRA-Regulated Materials
- Fluorosicilic Acid (Hydrofluorosicilic Acid) no plant exceptions
- Formaldehyde
- Formic Acid
- Halogenated Organic Compounds
- Hydroxyethyl Methacrylate
- Hydrochloric Acid
- Lachrymators (causes the eyes to tear)
- Perchloric Acid
- Poisons: Class B
- Poisons: WHMIS (Canada)
- Silicones other than Hydrogen-Bonded Silicon (SiH) Compounds – Pre-Approval Required
- Sodium Bisulfide
- Sodium Bisulfite
- Sodium Perchlorate
- Triethylamine

Please note: Certain MPS facilities may restrict the acceptance of additional materials due to high odor or other hazardous properties that conflict with their local operating circumstances.