



2006 EPA Container and Containment Rule – Role and Impact for Aerial Applicators



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Mike Jones - Technical Sales Consultant
Bayer CropScience – Iowa

J. D. Fish - Application Technology Manager
Bayer CropScience – RTP, NC

Jim Bloomberg – Product Development Manager
Bayer CropScience – RTP, NC

NAAA National Meeting, Las Vegas, NV, Dec 5, 2011



Response from Many Organizations and Individuals

Extensive effort!Cooperative effort!

- Registrants
- Distributors and Retailers
- CropLife America – Stewardship Committee
- ACRC - Ag Container Recycling Council
- EPA - Environmental Protection Agency
- ARA - Ag Retailers Association
- MACA - Mid America CropLife Association
- AASA - American Agronomic Stewardship Alliance
- NASDA - National Association of State Departments of Agriculture
- TPSA - The Pesticide Stewardship Alliance
- State Trade Organization – CPANC, IFAC, AAI and Others
- Container and Equipment Manufacturers

Many years to develop rule..... followed by a 5 year Implementation Process



Rule based on existing Best Management Practices commonly in use

Rule was first issued in August 2006

Registrants, Distributors and Retailers Given 5 Years to Implement.

Rule was implemented in several “steps”

Final step was reached on August 16, 2011.

Implementation will require response and cooperation of all involved. Includes:

Registrants

Distributors

Retailers

Equipment/Container Suppliers

Farmers

Custom Applicators.....Aerial Applicators

Key Steps taken by Bayer CropScience toward Compliance



Revised All Product Labels to Include Container Cleaning and Disposal Statements.

Tests to confirm that Products (specific TOX levels) can be rinsed until container is cleaned to 99.99% level.

Updated Bulk/Repackaging Agreements to:

Require specifications for Approved Refillable Containers

Require tamper evident seals, one way valve or both

Require cleaning procedures prior to refilling or disposal

Require a signed contract prior to repackaging.

Require record keeping of cleaning and repackaging process

What are Approved Refillable Containers.....Two examples.



Composite IBC



Roto Mold "Asset" IBC

Both meet DOT/EPA standards for Refillables.

Both must comply with inspection and testing standards.

Both must use one way valve, tamper evident devices or both.

Cleaning standards apply to both equally.

Manufacturers developed one way valves for both.

More Approved Refillables.....

BCS Endorses New Brochure from CLA

“Description of Refillable Containers for Liquid Pesticides”



Refillable Container Categories

| 1 | 2 | 3 | 4 | 5 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |    |    |    |   |

Goal - Help retailers and ag chem industry understand options



Refillable Container Specifications, Sourcing and Container Life Cycle

BCS provides basic information that allows retailers to purchase refillable containers from vendors or evaluate current supply. *Flexible and compliant approach.*

BCS has imposed a 2.5 year life for composite (caged) IBCs used with our products.

This practice is endorsed by key distributor/retailer customers.





IBC Upgrade Provided

- Early 2011, BCS upgraded specifications for 275 gallon Composite IBC from Schuetz used for a production package to include:
 - One way valve plus tamper evident seals
 - Vented top lid
- This offers value for this container as a “refillable” for use by our customers.
- Other IBC manufacturers such as IBC–NA and Snyder have upgraded their offers to include one way valves and vents.
 - IBC distributors (ex. Farmchem) now stock this upgrade, plus other refillables with one way valves.
 - ***New BCS has added serialized bar codes to all “refillable” IBCs first filled by BCS.***
 - ***Potential value of the serialized bar codes for the repackager.***





Why Use Tamper Evident Devices or One Way Valves on Refillable Containers?

Insures high standard of product quality

Avoids risk of product cross contamination during repackaging

Protects the registrant, retailer/distributor, custom applicator and farmer.

New M/Bulk Tank Labeling:

Non-Refillable: If non-refillable = “do not refill or reuse”

Recycling instructions on non-refillable

Refillable: Triple Rinse instructions on Refillable

End of life statement

Cleaning and Refilling responsibility

“Do not use for anything other than Pesticide”

Record keeping on container



When can tamper evident devices be removed by end users?

As directed by supplier (retailer, repackager or registrant)

As needed to access product, open ball valves or attach pumps,

Typical Practice....refillables will use both tamper evident devices and one way valves.

- Double protection. Ex. A Tamper Evident Cable can be removed to allow opening of a one way valve without violating intent of EPA Rule.

What happens if tamper evidence devices or one way valves are not used, removed or damaged?



First - Repackagers (retailers/distributors) must apply these devices on each newly repackaged refillable container. If not – EPA Rule is Violated resulting in fines.

If devices are removed or damaged by custom applicators or farmers, then the refillable MUST Be Cleaned by repackager as instructed prior to refilling.

Registrants and Repackagers (retailers/distributors) need cooperation from end users to avoid unnecessary or unplanned removal or destruction of these devices.

This will save costly cleaning process before repackaging or cost of replacing valuable refillable containers.

New rinsing tool from Bayer CropScience Available for 2012 Season



- Easy to use. Efficient
- Allows operator to save and use residual product
- Prepares container for refilling or recycling.

Container Management

1. Return for Repackaging
2. Pick Up Service for Recycling



1. Return Refillables for Repackaging

Follow directions from your supplier regarding tamper evident seals, container rinsing and return process.

2. Pick Up Service for Recycling of IBCs

Clean IBC to remove residual product. Consume rinsate according to product label.

Manufacturers of Caged IBC Offer a FREE Pickup Service. Follow directions listed on each IBC.

Container manufacturers which offer FREE Pickup Service include: Schuetz and IBC – North America.

If you have further questions regarding container disposal, contact the customer service number for the product registrant or contact the supplier (retailer or distributor).



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Any Questions?
Thank you!