



INDUSTRIAL WASTE RESOURCE GUIDELINES – CLASSIFICATION FOR REUSE

LARGE CONTAINERS ($\geq 200\text{L}$) CONTAMINATED WITH PIW

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INTRODUCTION

To achieve the best environmental outcome, large containers contaminated with prescribed industrial waste (PIW) have been classified by EPA because there are opportunities for their reuse and recycling.

Under the classification, disposal of large containers that have been contaminated with PIW is prohibited. They must be cleaned to allow them to be reused or recycled.

Large containers are steel and plastic rigid containers with a volume that is equal to or larger than 200 litres. Some common examples are: 205 L (44 gallon) steel drums, 200 L plastic 'Mauser' drums and 1000 L intermediate bulk containers (IBCs). The classification does not include flexible packaging types, such as 1000 L bulk bags.

There is a well established industry in Victoria that currently offers reconditioning of containers for reuse, and recycling of plastics and steel materials from clean containers that are not suitable for reconditioning.

IMPLEMENTATION

Containers may only be considered clean if they are free of all residues. There are a number of methods for cleaning containers, but a method producing the least waste is environmentally and economically preferable. The triple rinse method offers the most thorough rinsing process. Every attempt should be made to generate as little wash-water as possible when using this method, whilst still ensuring that the container is free of all residues. If wash-water cannot be re-used, pressure rinsing will produce less PIW than a triple rinsing method.

It is generally more efficient to clean containers at the point of utilising the contents, immediately after the container has been emptied. This practice reduces transport of the contaminated container and may make it easier to utilise residues or wash-waters.

Other reuse and recycling activities such as 'closed-loop' reuse systems would meet the requirements of the classification. The contaminated containers are returned directly to the product supplier for refilling, and recovery of embodied energy from large containers.

The following exclusions apply to the classification:

- Asbestos dust and friable asbestos may be contained in drums and transported to landfill for disposal. Large containers contaminated with other PIW must not be used to transport asbestos.
- Where a section of a large container is contaminated (for example, the base section of an IBC that is contaminated with a residual PIW that cannot be removed), that piece may be cut off and disposed of to landfill. The remaining portion of container must be recycled.

EPA has enforced the implementation of this classification through licence amendments and/or issuing notices.

WHAT THIS MEANS FOR YOU

Avoid generating contaminated packaging

- Choose an alternative packaging design and make sure containers are thoroughly emptied.
- Use 'closed loop' systems with product suppliers by returning containers to the supplier for refill, removing the need to clean containers prior to reuse.
- Avoid using containers for the delivery of wastes to waste treatment facilities.
- Do not use large rigid containers as PIW bins that are disposed of directly to landfill.

Arrange for used packaging to be reconditioned

- Where contaminating large containers is unavoidable, the residual PIW must be removed to enable reconditioning and reuse.

Arrange for used packaging not suitable for reconditioning to be recycled

- Where the container is not suitable for reuse, it must have the residual PIW removed to enable the recycling of steel and plastic materials.
- EPA-permitted transporters of contaminated large rigid containers must transport them to a facility licensed or exempted from licensing to undertake

This guidance forms part of the Industrial Waste Resource Guidelines (IWRG), which offer guidance for wastes and resources regulated under the *Environment Protection (Industrial Waste Resource) Regulations 2009* (the Regulations). Publication IWRG422 – June 2009.



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reuse, recycling or storage, of contaminated large containers.

- Receivers of contaminated large rigid containers must undertake reuse, recycling, or storage. They must be licensed or exempted from licensing for the reuse or recycling of containers

General

Large containers (>200 L) contaminated with PIW must be managed in accordance with the classification, the requirements of the *Environment Protection Act 1970* and the *Environment Protection (Industrial Waste Resource) Regulations 2009*.

FURTHER INFORMATION

- A list of companies able to accept and treat PIW containers is available on EPA's website at www.epa.vic.gov.au/waste/iwdb
- *Government Gazette No. G14* (published 5 April 2007) Prescribed Industrial Waste Classification.

Environment Protection Act 1970

ACT NO. 8056/1970

Industrial waste management policy (Prescribed Industrial Waste) 2000

No. G14, 5 April 2007

Prescribed Industrial Waste Classification

1. For the purpose of clause 11(1) and in accordance with Schedule 1 of the Industrial waste management policy (Prescribed Industrial Waste) the Authority hereby classifies containers greater than or equal to 200 litres in volume contaminated with prescribed industrial waste as having currently available¹ opportunities for reuse and recycling in the State of Victoria.
 2. The classification applies to containers that are rigid steel or plastic, with an original volume greater than or equal to 200 litres, and contaminated with prescribed industrial waste as prescribed in Part B of Schedule 1 to the *Environment Protection (Prescribed Waste) Regulations 1998*.
 3. This classification will come into effect on 1 July 2007.
- 1 **Currently available:** The prescribed industrial waste has potential for reuse, recycling or recovery of energy and such reuse, recycling or recovery of energy is practicable. This means that the facilities required to realise this potential are available in the State of Victoria, or elsewhere in Australia in a location practicably accessible