



KODAK Returnable Drum Program

CURRENT INFORMATION SUMMARY CIS-139

Description

You can help minimize solid waste by participating in the KODAK Returnable Drum Program. This program offers a simple and convenient way to recycle chemical drums used in photofinishing or plate processing.

The following guidelines are designed to assist you in preparing to return empty Kodak drums in compliance with the shipping requirements set forth by the United States Department of Transportation (D.O.T.). Because states and localities may have different requirements, check your local regulations.

1. You must comply with all city, state, and federal regulations.
2. The drums must have contained fresh Kodak chemicals only. You may return the following Kodak *empty* plastic drums:
 - 55 gallons (25 lbs)
 - 30 gallons (18 lbs)
3. The drums must be legally empty, with the exterior free of chemicals. According to EPA regulations, containers must be completely empty and drip dry. Containers must be free of any residue that could be removed by using practices commonly employed to remove materials for that type of container, e.g., pouring, pumping, and aspirating *and* no more than 2.5 centimeters remain on the bottom or the container after implementation of ordinary methods *regardless of the product description*. Without exception, each container must be in compliance with Federal Regulation 40 CFR 261.7 or California Title 22 66261.7 (when generating from or shipping to California reconditioning companies). Kodak customers must understand that containers not meeting the requirements of these regulations will be quarantined and the generator will be responsible for all inbound freight costs, all return freight costs, and reasonable handling fees.
4. Be sure both bungs (closures) are in place and that plugs are reinserted and tightened. Important: See Closure Notification on page 5.
5. Be sure that the original product labels are in place and not defaced in any manner. Never remove labels or paint over them.
6. No additional packaging is required; do *not* ship the drums on pallets.
7. Follow the instructions for arranging return transportation and preparing the Bill of Lading, which is obtained directly from the National Container Group. National Container will arrange the preferred carrier.
8. Sign a copy of the empty drum certificate located on page 3 of this document, and attach it securely to one of the empty drums that you are shipping. We recommend that you enclose it in a plastic sleeve that is attached to the drum.

How to Return Empty Drums

The return transportation of empty drums is one of the major elements to the success of the program. Your cooperation is needed to help us minimize transportation costs.

1. Accumulate as many drums as possible. Ship a minimum of 20 drums and a maximum of 50 drums.
2. National Container Group (NCG) will arrange the preferred carrier. Call 1-800-774-6956 when your containers are ready to return. NCG will fax you a preprinted Bill of Lading. Once you have signed and faxed back the BOL, NCG will arrange for a pick up within 5 to 7 business days. If you do not use NCG or violate the parameters of the return program, you will be billed for charges incurred.
3. Fill out the preprinted fax copy of the Bill of Lading form. Follow the instructions listed in How to Prepare the Bill of Lading, below.
4. Distribute copies of the Bill of Lading form as follows:
 - Customer retains one copy as proof of return.
 - Give two copies to National Container.
 - Attach one copy with the signed empty drum certificate securely to one of the empty drums.
5. If you have any questions, please contact your Kodak representative, or call the Kodak Contact Center at 1-800-242-2424.

How to Prepare the Bill of Lading

It is the shipping party's responsibility to comply with all United States Department of Transportation regulations when filling out a Bill of Lading. Failure to follow these instructions could result in the shipping party being in violation of the law.

1. Enter the full name and address of your company, including zip code, in the "Shipper" section.
2. Enter your assigned Shipper Number.
3. Enter the date that the shipment is picked up by the carrier.
4. Determine the proper description for each drum you are shipping. It is IMPERATIVE that all drums be properly described. Failure to do so could result in a fine for failing to follow D.O.T. regulations.

Hazardous Residue Drums—If you are returning an empty drum that contained a hazardous material, you must list it in Section X, (Hazardous) of the Bill of Lading located at the top of the form. See the sample Bill of Lading. Compare the hazardous material CAT No. on the drum to the list of CAT Nos. in Table 1 (page 3) to determine the proper Bill of Lading code. For each CAT No. listed in Table 1, find the corresponding Bill of Lading code in Section X.

If you have an empty drum that contained a product labeled a hazardous material and it is not listed in Table 1, it cannot be returned at this time.

Non-Hazardous Residue Drums—Any empty drum that did NOT contain a hazardous material should be described as Freight All Kinds (F.A.K.) using "residue drums non-hazardous" section in the Bill of Lading, is located at the bottom of the form. See the sample Bill of Lading.

5. Fill in the number of drums in the column marked "No. Pieces." Be sure that you list all drums under the proper description.
6. Fill in the column marked "Weight" by multiplying the drum weight by the number of drums listed for that description.
7. Add the total number of all regulated and non-regulated drums. Put this total in the section marked "Total Pieces."
8. Add the total weight of all regulated and non-regulated drums. Put this total in the section marked "Total Weight."
9. Sign the Bill of Lading under "Per Shipper Signature."
10. Have the carrier sign the Bill of Lading in the "Freight Carrier Authorized Signature" section.
11. If you have used the hazardous materials section of the Bill of Lading, call the driver's attention to the notes on the Bill of Lading concerning the "...assistance involving chemical leaks and other ... toll free."
12. If the driver doesn't have a guidebook, do not ship the drums! Immediately notify the carrier's terminal and your Kodak representative. Use the hazardous materials section of the Bill of Lading only if you are shipping any products that are listed in the table as being regulated by the United States Department of Transportation.
13. Print out and *sign the empty drum certificate* included in this CIS document. *Attach* this copy securely to one of the empty drums.

DOT Training Requirements

The U.S. Department of Transportation (49 CFR Subpart H) requires shippers to train, test, and certify hazmat employees every three years in General Awareness, Safety, and all Function-Specific hazmat responsibilities. A "hazmat employee" is anyone involved in the classification, packaging, marking, labeling, documentation, loading/unloading, placarding, and transporting of hazardous materials. New employees or employees transferred into new job functions must be trained and certified within 90 days of assignment. Additionally, such employees are forbidden from performing their hazmat functions unless supervised by a fully trained and certified employee. A record of current training, inclusive of the preceding three years, shall be created and retained by each HAZMAT employer up to 90 days following employment termination.

Table 1. KODAK Returnable Drum Bill of Lading Code for Hazardous Materials

CAT No.	Product Name	Bill of Lading Code
128 6350	KODAK Clean Print Fountain Solution	H
149 3600	KODAK EKTACOLOR RA Developer Regenerator, Part B	J
158 7013	Sword Excel Regenerator	B
167 6303	KODAK FLEXICOLOR RA Bleach Replenisher NR	F
187 4858	KODAK 78% Acetic Acid	A
800 1273	KODAK EKTACOLOR RA Developer and Replenisher, Part C	D
805 3894	KODAK EKTACOLOR RA Bleach Fix Replenisher, NR, Part C	A
815 8784	KODAK EKTACOLOR RA Bleach Regenerator	G
827 5950	KODAK FLEXICOLOR Developer Replenisher LORR, Part A	I
836 5132	KODAK EKTACOLOR RA Developer and Replenisher, Part B	J
838 3036	Silverstar Positive Developer	N
838 4455	KODAK FLEXICOLOR Bleach III Replenisher	E
838 5296	KODAK EKTACOLOR RA Developer Regenerator, Part C	C
865 6423	KODAK Bleaching Agent, BL3	E
865 9591	KODAK Com Professional Developer Replenisher	I
888 0361	KODAK 78% Acetic Acid	A
892 5554	KODAK FLEXICOLOR Bleach III HV Regenerator	L
30004359	KODAK 980 Plate Regenerator	B

Empty Drum Certification

I hereby certify that these drums are "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.**

Date: _____ Company Name: _____

Authorized Signature: _____

* With regard to most regulated residues, EPA's 40 CFR 261.7 says "A container. . . is empty if:

- (i) All wastes have been removed that can be removed using the practices commonly employed to remove materials for 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 . . ."

EPA has explained this rule, saying "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. The rationale for this provision is that there are certain tars and other extremely viscous materials that will remain in the container even after the container is emptied by normal means."

For residue of products specifically listed by name in 40 CFR 261.33(e), EPA says that 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.

** DOT's 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 drum were full of its original contents. A DOT shipping paper is not required for transportation of a drum for reconditioning via contract or private motor carrier. DOT placarding is not required for vehicles carrying only empty containers.



EXAMPLE

STRAIGHT BILL OF LADING

1-800-774-6956 FAX: 630-654-2141

Date Shipped:		
Shipper No:		
Arrangement No./BOL No.		
Consignee: (TO)		
Contact:		

**FOR KODAK CUSTOMERS
ORIGINAL — NOT NEGOTIABLE**

Dock Hours:	
Shipper:	
Contact:	

TO CALCULATE THE WEIGHT OF THE SHIPMENT, MULTIPLY THE NUMBER OF DRUMS BY THE FOLLOWING CONVERSION WEIGHTS:
EMPTY 55 GAL DRUM = 22 LBS, EMPTY 30 GAL DRUM = 16 LBS, EMPTY 15 GAL DRUM = 16 LBS

NO. PCS	PKG	HM	X	USE THIS SECTION FOR	RESIDUE DRUMS, HAZARDOUS	B.L. CODE	ENTER WEIGHT	U/M
	DR.	X	RESIDUE		RESIDUE: LAST CONTAINED UN2790, ACETIC ACID SOLUTION, 8, PG II (CHEMICALS NOI)	A		LBS.
	DR.	X	RESIDUE		RESIDUE: LAST CONTAINED: UN1824, SODIUM HYDROXIDE SOLUTION, 8, PG III, (CHEMICALS NOI)	B		LBS.
	DR.	X	RESIDUE		RESIDUE: LAST CONTAINED UN3268, CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S. (POTASSIUM CARBONATE, POTASSIUM HYDROXIDE), 8, PG III (CHEMICALS NOI)	C		LBS.
	DR.	X	RESIDUE		RESIDUE: LAST CONTAINED UN1814, CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S. (POTASSIUM HYDROXIDE) 8, PG III (CHEMICALS NOI)	D		LBS.
	DR.	X	RESIDUE		RESIDUE: LAST CONTAINED UN3265, CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S. (ACETIC ACID), 8, PG III (CHEMICALS NOI)	E		LBS.
	DR.	X	RESIDUE		RESIDUE: LAST CONTAINED UN1760, CORROSIVE LIQUIDS, N.O.S. (FERRIC AMMONIUM PROPYLENEDIAMINETETRAACETIC ACID), 8, PG III (CHEMICALS NOI)	F		LBS.
	DR.	X	RESIDUE		RESIDUE: LAST CONTAINED UN1760, CORROSIVE LIQUIDS, N.O.S. (POTASSIUM BROMIDE), 8, PG III (CHEMICALS NOI)	G		LBS.
	DR.	X	RESIDUE		RESIDUE: LAST CONTAINED UN3265, CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S. (CITRIC ACID), 8, PG III (CHEMICALS NOI)	H		LBS.
	DR.	X	RESIDUE		RESIDUE: LAST CONTAINED UN3268, CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S. (POTASSIUM CARBONATE), 8, PG III (CHEMICALS NOI)	I		LBS.
	DR.	X	RESIDUE		RESIDUE: LAST CONTAINED UN3265, CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S. (4-(N-ETHYL-N-2-METHANESULPHONYLAMINOETHYL)-2-METHYLPHENYLENEDIAMINE SESQUISULPHATE MONOHYDRATE), 8, PG III (CHEMICALS NOI)	J		LBS.
	DR.	X	RESIDUE		RESIDUE: LAST CONTAINED UN1760, CORROSIVE LIQUIDS, N.O.S. (ACETIC ACID, FERRIC AMMONIUM PROPYLENEDIAMINETETRAACETIC ACID), 8, PG III (CHEMICALS NOI)	L		LBS.
	DR.	X	RESIDUE		RESIDUE: LAST CONTAINED UN3268, CORROSIVE LIQUID BASIC, INORGANIC, N.O.S. (DISODIUM METASILICATE), 8, PG III (CHEMICALS NOI)	N		LBS.

FOR ASSISTANCE INVOLVING CHEMICAL LEAKS & OTHER TRANSPORTATION EMERGENCIES CALL DAY OR NIGHT 1-800-445-3293 TOLL-FREE

NO. PCS	PKG	HM	X	USE THIS SECTION FOR	RESIDUE DRUMS NON-HAZARDOUS	ENTER WEIGHT	U/M
	DR.	Y	F,A,K				LBS.
TOTAL PCS						TOTAL WEIGHT	LBS.

**FREIGHT CHARGES
THIRD PARTY**

Bill Freight To:	

By signing this certificate I am accepting the terms of the Containemax® Collection Program. I understand that all containers offered for pickup must be completely empty (i.e. drip-dry, granule-free) and free of any residue that could be removed by ordinary methods **regardless of the product description**. Without exception, each container is in compliance with Federal Regulation 40 CFR 261.7 or California Title 22 88281.7 (when generating from or shipping to California reconditioning companies). I understand that containers not meeting the requirements of the regulations will be quarantined and that I will be responsible for all inbound freight costs, and reasonable handling fees.

I also certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Shipper: _____ Freight Carrier: _____

Authorized Signature: _____ Authorized Signature: _____

PLEASE PROVIDE DRIVER WITH THIS BILL OF LADING AT THE TIME OF PICKUP.



CLOSURE NOTIFICATION

Product Type: Plastic Tight Head (PTH)

TIGHT HEAD PLASTIC DRUM CLOSURE NOTIFICATION

This method of closure should be used to ensure that your containers have been closed in the same manner as when they were initially tested to comply with the requirements of the US Department of Transportation in CFR 49 Part 178.2(c)(1) Performance Transportation of Dangerous Goods in the United States.

Your product may adversely affect container materials, or closing devices. Greif Bros. Corporation has advised the US Department of Transportation that the product compatibility is the customer(s)/filler(s) responsibility.

These instructions for container closure are based upon the closure methods used to enable these containers to pass the qualification test for registration to the United Nations.

The closure recommendations do not take into account any hazards present in your facility, or the handling, filling or shipping methods used by your facility.

Containers with obvious damage or deterioration should not be filled or shipped. Listed below are the closure size and type needed per container size. To order replacement closure(s), contact Patricia Hartleben, Kodak Photochemicals at (585) 477-3791.

55-Gallon Drum NPS 2" Closure and BTR (Buttress) 2" Closure 30-Gallon Drum NPS 2" Closure and BTR (Buttress) 2" Closure

To close:

1. Openings in tight head plastic drums **MUST BE FITTED WITH** plugs bearing NPS and/or BTR threads.
2. Plugs must be fitted with gaskets appropriate to the plug size and design.
3. Plugs must be placed into the appropriate openings and tightened to a torque level of 20 FT-LBS for 2" fittings and 9 FT-LBS for all 3/4" fittings.

If you have questions regarding the Closure Notification, contact Kodak's Worldwide Hazardous Materials Transportation Hotline at (585) 722-2400.

Kodak

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KODAK Publication No. CIS-139 (ENG)

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